

**FILED**UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEENASHVILLE DIVISION

2013 OCT -7 PM 1:12

U.S. DISTRICT COURT  
MIDDLE DISTRICT OF TNChris Sevier  
Plaintiff

V.

John Rich, Bill O'Reilly, T.V.

Guide Network, CBS

Corporation, Lions Gate

Entertainment, Nila

Frederiksen, Ben &amp; Jerry's,

Justus Dobson, Lars

Frederiksen, Detective Sandra

Yandle, Channel 4 News,

Cyndi McKenzie. Marc

Oswald, Krisann Hodges,

Barry Scarbrough, Tammy

Meade,

Defendant

CASE NO:

JURY DEMAND

**COMPLAINT**

*A system of guilty until proven innocent; if they did this to a lawyer, imagine what they are doing to the poor and defenseless; operation restoration of Honor*

**INTRODUCTION AND SUMMARY**

Now Comes the Plaintiff, Chris Sevier, against John Rich, CBS Corporation, Lions Gate, T.V. Guide Network, Nila Frederiksen, Justus Dobson, Lars Fredickson, Detective Sandra Yandle, and Tammy Mead for damages and states "what else could you have possibly expected when you dishonor a Court Officer." This is lawsuit number 12 involving Mr. Rich and myself, and my primary intent here is to make peace and address systematic flaws that should be fixed by the legislature. I also hope to promote the restoration of a sense of things that should be

honored and respected, while deterring these defendants. I will not allow these defendants to dishonor the legal profession and the United States military in the ways that they have here, by their escalation of conflict and spread of false ideas. For years now, Mr. Rich and Mrs. McKenzie have made it their mission in life to hurt me for being an attorney with the moral character with the courage to stand up to tyrants like them, who have apparent infinite resources and no shame. Oppressing a Court officer and combat veteran discriminately is dishonorable and should not be tolerable in civilized society. Mr. Rich's inability to let things go, as demonstrated on the Celebrity Apprentice, when Gary Busey called him "boy", is the personality trait at the root of this entire conflict: <http://www.youtube.com/watch?v=oywB5aOUg4c>. The despicable activity of those who thought wise to placate to Mr. Rich or capitalize on his initiatives are at fault here for good cause and should be brought to accountability so that this kind of thing does not happen again. I am asking the criminal, state, and federal court to help push us towards termination of a conflict that has no upside, while making me whole and making adjustments to the system of justice in Tennessee. I recommend that Hollywood producers make a movie out of this because of what it says about the current state of the criminal justice system in America that is failing.

**1. THE DANGER OF ANGER:** The true danger of litigation is the anger that it has the capacity to breed. Anger is an indiscriminate emotion, which makes it dangerous. I myself could become angry at the amount of injustice here and it only serve to poison my heart. I could not imagine how any of the attorneys I know would feel if they found themselves in my situation, which makes me grateful that it is I, who am in this unjustifiable circumstance, and not them. The problem with pursuing justice through courts is that it is designed to be so frustrating



that it creates anger, and anger can spill out and hurt other relationships that have no part of the litigation. I call it the "transference of animosity." Above all else, I do not want to have a distorted soul like so many of the defendants named here.

**2. SPIRITUAL WARFARE:** The day after the last false arrest, Channel 5 news asked me why bad things keep happening to me, and the exact answer is "spiritual warfare." When you have set out to have impact on the greater good to the degree that I have, you tend to come under attack by otherwise inconsequential individuals, who have yet to discover a purpose in life with actual meaning. These individuals create ancillary conflict that has the potential to distract someone like myself, with potential for great impact, from fulfilling their higher calling. Yet, I believe that I have been put in this situation for a reason. The forgiven tend to forgive - so that is good news for the defendants, given my relationship with Jesus Christ. These defendants are not my enemy, but the sources that have made them act like this is - the values and philosophies that compel them. The evidence shows that like gravity, spiritual warfare exists, whether we choose to believe in it or not, which this case verifies. This lawsuit indirectly supports my cause of action against Apple and Hewlett Packard because it demonstrates the need for safe guards for the human heart.

**3. DANGERS THE DEFENDANTS REVEAL ABOUT THE NEWS:** The defendants here are dangerous insofar as they have all expanded conflict unreasonably to the point of creating false beliefs. While (1) I am not a stalker, (2) I have done nothing even remotely inappropriate, and (3) I do not file frivolous lawsuits, what is true is that (1) Mr. Rich is a hostile soul, who manipulated everyone here; that (2) the news reported sensationalism, not facts for ulterior

purposes, creating false beliefs; and that (3) Mrs. Frederiksen seized an opportunity to add more meaning to her life by joining a bandwagon built on dishonesty. These people have set out to allow others to imagine things that are not even there for their own benefit in utter defiance of tort law.

4. **SECULAR HUMANISM**: Currently in America, anyone can report anyone for a crime and have them arrested with constructive impunity. That is the take away from this case unless this Court allows for the imposition of liability. If the falsely charged suspect does not have money or family members to pay their bond, they effectively stay in jail without due process, allowing the alleged suspect to be victimized by the alleged victim despite the establishment of guilt. Such a policy effectively makes being poor a crime in America, which is inconsistent with our founding principles of "liberty and justice for all. To discriminate against the poor, while rewarding the depraved hearted accusers, in this regard is inhuman and cruel. This is especially true given the dismal condition that the prisons are in. The evidence demonstrates that the Department of Correction run prisons and penitentiaries are terrible places, where hurting people are placed with other hurting people, which makes everyone worse than before. Society has set itself and our inmates up for failure, as the former inmates are released back into society and unsurprisingly transfer the hurt inflicted on them onto others. There is no actual transformation of the heart in jails. (I believe that is because transformation of the heart can only come from a continuing relationship with God through faith in Christ.) The recidivism rates are 75% in most parts of our country for our inmates, which conclusively shows that the state has failed in its efforts to reform. But the state does not have a monopoly on the heart transformation. The local church does. I blame the local churches for not taking a more proactive role in engaging in prison

ministry, which it can do give the advents of modern technology. (The state commissioner of Alabama has a system in place that is working that should be replicated nationwide). Although I am a proponent of mega churches, because their are power in numbers, I long to see mega churches take on more social justice issues such as this one. This is why I have set out to do everything in my power to compel local churches to take a more proactive role in new forms of effective ministry in their local prisons within the zone of their influence. (See attached). Because God cares about the oppressed so do I, and so should the local church. Currently, shows like "locked up" show that jails are just tanks of cruelty that need reformation. There needs to be personalized financial incentives given to prison officials who can keep their facilities beds empty, not full. I would like the legislature in every state to fix this glaring problem, which will open the doors for more outreach from community groups that care about inmates, most of whom never had a chance in life. I spent only a few hours in jail following these false arrest, but that was plenty long to observe that real change in the prison needs to take place and that should start with the local church being more proactive.

**5. DISCREDITED NEWS THAT PROLIFERATES FEAR AND DOES MORE HARM**

**THAN GOOD**: The media and papers like, Mug Shot or Busted, are allowed to portray the incarcerated individual as being a guilty criminal, despite the fact that their innocence or guilt is not determined, this can cause the libeled arrestee to suffer emotional distress. There is something inherently dishonorable and immoral about such practices. Moreover, the reporting in this fashion creates a bandwagon effect that generates misplaced fear, which creates additional problems in the community. Mrs. Frederiksen is at best a victim of the news' unfounded right to produce unwarranted fear for invalid ulterior purposes; she is not, however, a victim because I



like ice cream, green tea, forgot her name, and play in a band that shoots music videos in Music City. As someone who has personally served in Operation Iraqi Freedom in fighting the war on terror, I can attest that the American news media creates more terror in society by negative reporting than all of the terrorist organizations ever have combine. To suggest otherwise is a categorical rejection of reality. People need to stop watching the news in America, which breathes negativity to get ratings. My case is a small indication of the harm that the news can produce through false reporting for the sake of ratings and sensationalism before a determination of guilt. The news generates fear to keep people interested which makes people believe that the world is a more dangerous place than it is. Mr. Rich knows all too well that once you are cast as a criminal in the media, it is hard to erase this public perception, even following a verdict of innocence. (Mr. Rich was cast as a violent person because that is exactly what he is.) Fear is a paralyzing emotion and arrests the development of our Country economically, relationally, and in other ways. Such activity should not be tolerated in civilized society in 2013, and there needs to be restriction on the news from casting someone as being guilty before there has been a determination of guilt or innocence. We need the media to promote a culture of integrity, not sensationalism. We need Assistant District Attorneys and police officers to go through extensive character training so that they have the discernment not to go along with fearism that leads to false accusations. The fact that the police and District attorney's office would allow a lawyer to be falsely charged with something as ridiculous as "stalking," not once but twice, is a glaring indictment on the trustworthiness of the police and district attorney's office.

6. **THE DANGER OF GREED**: Next to anger, another emotion that poses a threat to myself is the emotion of greed. The righteous indignation part of me wants to litigate these reprobates into

a black hole and bankrupt them entirely for acting so dishonorably. I am demanding what I am requested for good cause. But in this life, we only have so much time, and we must be selective on where we invest our time or one can find that they lose the most by winning. None of us were really designed for quarrels and fighting one another. Fortunately, for these named here, I am convinced that affording them grace is the least worse alternative, given the fact that we are not equals. Accordingly, I might give each one of the defendants a way out of by suggesting rule 68 offers of settlement that might look like this:

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**7. POSSIBLE PROPOSED RULE 68 SETTLEMENT OFFERS:**

a. For Bill O'Reilly, I will drop the lawsuit if he agrees to report the other side of the story concerning myself; <http://1389blog.com/2013/07/19/accidental-pervert-chris-sevier-suing-apple-for-causing-his-porn-addiction/>. That is, I'll drop Mr. O'Reilly from this lawsuit if he brings Patrick Carns, Tim Keller, or comparable subject matter exporters on internet porn onto the factor to discuss the merits of my litigation against Apple and Hewlett Packer, and whether the United States should be responsive to British Prime Minister David Cameron's call to form a joint task force with the UK. The Prime Minister's has asked the U.S. to join the mandate on search engineers and device makers to install preset filters that will protect children and marriages and keep device makers in compliance with child obscenity laws. Our culture has developed a warped view of sex that is counter production and destructive. Mr. O'Reilly, like Mr. Rich, is an individual who is not above the law. Mr. O'Reilly knowingly furthered Mr. Rich's libel campaign by falsely stating on the factor that there were a restraining order against me, while willfully engaging in all manner of slander against a Court Officer, which is dishonorable

actionable conduct. Its a matter of public record that there were no restrains against me and that Mr. Rich just invented that notion to cause me to be arrested and smeared in the media as a former of "payback." Mr. O'Reilly also suggested that all of my lawsuits were frivolous, including an unrelated one against Apple that is designed to cut back the demand side of sex trafficking and child pornography. Mr. O'Reilly indicated that I should have to pay the fees of my adversaries in all controversies. If Mr. O'Reilly was competent about our laws, he would know that in America, we have the American Rule, which can be preempt by statutory fee provisions, and that there is no need to have fee shifting laws installed because that is what rule 11 is for. If a party believes that a baseless lawsuit has been brought against them, they have the right to seek rule 11 sanctions, after compiling with the safe harbor provisions, which transfers litigation expense to the other party. However, Mr. O'Reilly should be advised that if the party who moves for rule 11 sanctions fails to obtain them, the mover will be sanctioned. While Mr. O'Reilly was correct that fee shifting is an automatic practice in Europe, Mr. O'Reilly should be reminded that libel per se is a crime in Europe and that he could be arrested for what he said on his show against me, if European law was applicable. Fortunately, Mr. O'Reilly and I share the same values 99% of the time, and I am a fan of him and Fox News, so I will likely defer to 1 Corinthians 6 and extend him the grace, showing respect for someone who is older and has a job of importance for us all. If Mr. O'Reilly had allowed me to respond in opposition to the one sided version of the knowingly false facts he provided, he might not be named personally in Federal lawsuit in Tennessee. If I accepted the proposed rule 68 offer that I have suggested here concerning this individual anchor, my liberal friends at CNN might find such unwarranted leniency comparable to Ford pardoning Nixon, but what kind of person really likes CNN



anyway.

b. For T.V. Guide, CBS Corps, and Loins Gate: if they terminate their contact with John Rich immediately, I might likely release them from the litigation. Mr. Rich had the judgment to falsely accuse a combat veteran and court officer of a crime to benefit his contract with these defendants. I would also suggest to T.V. Guide, CBS Corps, and Lions Gate that they give opportunities to with strong moral character, like Le crae, and not scoundrels like Mr. Rich, who use their celebrity influence to oppress others for personal gain. Mr. Rich is a reckless person who will use influence given to him by T.V. Guide to cause harm. Additionally, I will also suggest that they unofficially consider making programs that are of the same spirit as Duck Dynasty, which promotes family values and honorable conduct for a change. Our Country is in desperate need of positive influence that strengthens the heart, and Hollywood needs to start giving us role models that the culture in positive directions. Most of the world is centered around the institution of family, and these networks need to promote programming that reflects that in pushing our culture back to a place of honor - strengthening families, not destroying them.

c. For Mr. Frederiksen, I might drop this lawsuit, if he calls off all the litigation between us immediately. I would also ask that Mr. Fredickson write a short memo on how situations like this could be avoid in the future. Mr. Frederiksen might also have to reimburse me for the documented out of pocket litigation expenses regarding his daughter's fraud, as a matter of equity; he can seek indemnification from Mrs. Dobson, Mr. Rich, Mrs. Hodges, and Mrs. McKenzie. For Mr. Frederiksen to jump on the bandwagon and falsely accuse a former combat veteran and court officer of crime he knew was impossible to commit under the circumstances is

intolerable conduct that warrants severe repercussion. While no one can fault a father for wanting to protect their family, Mr. Frederiksen must come to terms with the fact that, at best, he and his daughter were victimized by Mr. Rich and Mrs. McKenzie's dishonesty and those who enabled it. Mr. Frederiksen should also understand and acknowledge the fact that Mrs. Dobson and Mrs. Frederiksen have been overtly dishonest in this situation, given the evidence of their embellishments and overt lying, is intolerable misconduct. Mr. Frederiksen knew that his daughter does acting and modeling for a living and could not have possibly seen my attempt to invite her to be in a music video as a threat, when she regularly volunteers for risqué photo shoots like this:



While he might not have an excuse, he has incurred serious liability.

d. For Justice Dobson and Nila Frederiksen, I might offer that they do 200 hours of community service through churches programs that are traditionally approved by this Honorable Court to be completed with in the next 9 months. I ask that they agree to be drug tested for twice month for the next 9 months. Also, I'd ask that these individuals warrant not to do this kind of thing again, demanding that they immediately call off litigation between us and issue a correction and apology. If I was in their shoes, I would want the person I accused to extend grace to me, as well so that it would not wreck my future by having judgments that followed me. While they cannot

call me a "stalker," they can attest that "I am a man of my word" in explaining that there could be adverse legal consequences for them if they opposed my legal interest for personal gain.

e. For Mrs. McKenzie, I might drop the suit if she promises to get therapy and agrees to never represent John Rich again. Like myself, Mrs. Mckenzie is another Court Officeer, but she rarely upholds the duties of her license, so that makes her worthy of contempt and scrutiny on a different level. I will recommend that she leave the state of Tennessee and return to Mississippi.

Her firm and marriage fell apart as a rest of trying to hurt me because karma tends to exists whether we believe in it or not. I am well aware that after 5 years of litigation she is void of assets, serenity, and competency. I am calling for the Tennessee Supreme Court to disbar her and to punish the BPR officials for being non responsive to her flagrant ethical misconduct, as she continues to frame people for crimes they did not commit for her personal benefit in utter defiance of her oath as an attorney. Mrs. Mckenzie has dishonored the legal profession and the United States military in engaging malicious plots to keep Mr. Rich shelling out huge attorney's fees. Mrs. McKenzie could have had this entire controversy resolved in 20 minutes, after I filed the first lawsuit against Mr. Rich, but because she is greedy, she seize upon my straight forward case to merciless bill Mr. Rich because she is a "sell out."

f. For Krisann Hodges, I might drop the suit if she terminates her abuse through the ethics commission that Mr. Rich and Mrs. McKenzie instigated in misusing her office for Mr. Rich's benefit. I am not going to allow Mrs. Hodges and the Tennessee Supreme Court dishonor the United States military anymore than they have. Mrs. Hodges knows that the evidentiary record shows that I have never committed any ethical violations and that I am capable of practicing law



as I am doing here now as she reads this sentence. Pending now before the Tennessee Supreme Court is my recent petition to reverse the decision to deactivate my law license because I sustained a combat related war injury - PTSD in fighting Al Qeda overseas. The Tennessee Supreme Court must be an institution of honor and not have anything to do with discrimination against wounded warriors, as Mrs. Hodges has caused it to do so my case. The Tennessee Supreme Court recently ruled a couple of weeks ago in response to my September petition that following a decision by Dr. Walker, I can resume my Tennessee law license. Upon acquisition, I will resign my Tennessee law license as a matter of honor out of disdain for the lack of respect for the rule of law demonstrated in the Courts of Tennessee that have held that which warrants honor in contempt. Mrs. Hodges knew that Mr. Rich and Mrs. McKenzie would take the Tennessee Supreme Court's inaccurate and prejudicial findings to advance their quest to liable me in the media. Mrs. Hodges should acknowledge that because of this I have called upon the Department of Defense Inspector General's office to reopen these matters and to start prosecuting offenders given the adverse implications to service members, who should not be prejudiced unduly for leaving behind their personal affairs to carry the burdens of our nation overseas in a foreign theater of war. I would like Mrs. Hodges to assume the cost of that unnecessary expense regarding Dr. Walker personally, since it was Mrs. Hodges grand idea to use military service to prejudice me before the Tennessee Supreme Court as payback for my personal lawsuit against her. I also ask that Mrs. Hodges for once do her job and bring Mrs. McKenzie to accountability for her abundant ethical violations that are root of this action. Mrs. McKenzie should be disbarred to restore integrity to the Nashville Bar. Mrs. McKenzie has disgraced the bar and has engaged in misuse of her law license that greatly proliferated this conflict and taints the justice

system as being an institution of dishonor. Additionally, I would like a determination from the BPR as to whether Mrs. McKenzie's continued representation of Mr. Rich is meritorious under these conditions in lawsuit number 7, given the fact that she is a codefendant with him in this case, which creates additional conflict of interests, 1.7 and 3.7, problems. I would like Mrs. Hodges to issue a determination as to whether her non-responsiveness to my well documented complaints against Mrs. McKenzie, and her own discriminatory actions against a combat veteran before the Tennessee Supreme Court have improved the reputation of the Nashville Bar or made it worse. Mrs. Hodges should understand and acknowledge that I am demanding that the Tennessee Supreme Court terminate her from the BPR for selective application of the rules of professional responsibility, waste, mismanagement, and flagrant unethical misconduct that was prejudicial to members of the armed forces in demonstrating contempt for personal gain. It is a matter of common sense that Tennessee needs the BPR to prosecute the attorneys, like Mrs. McKenzie, who defend scoundrels like Mr. Rich through improper legal tactics, while leaving lawyers, like myself, who attempt to stand up to people like Mr. Rich, alone. Court's of law should not be based on money, but on helping the innocent, oppressed, and victimized, and bottom-lines will take care of themselves.

g. For Officer Scarbrough and Detective Yandle, as a former military officer and overseas missionary, I know fewer people, who have as much respect for law enforcement as myself. I have always made respecting police officers a part of who I am. I regularly buy officers food or coffee, whenever they are in a restaurant with myself, as a way of showing them appreciation for their service. That jester is more for my benefit than theirs. I know that the police work is changeling, and I think that is should go without saying that Soldiers, police officers, and fire

fighters deserve actual respect, not just lip service appreciation. But the current policy regarding the minimal probable cause requirement associated with crimes like "stalking" converts police officers into agents of injustice, which cannot be tolerated by civilized society in 2013. These outdated policies are patently inequitable and warrant contempt. I would like Officer Scarborough and Detective Yandle to write a short essay that could be presented to the Tennessee legislature, which explains what they think could have been done differently to avoid these kinds of abuse of police powers in the future. These officers should understand that because they allowed these false charges to go forward, they have made the alleged victim liable for abuse of process and malicious prosecution, which could cause them to be as financially bankrupt as their character was when they made the false report. I think on behalf of the American Bar Association, all lawyers in America would appreciate me suggesting that the police should think twice before allowing warrants to be wrongfully be issued against an a Court Officer, especially when that attorney is the opponent of the alleged victim in acrimonious civil litigation. Police officers should not be quick to make arrest of Officers of the Court, because it is us lawyers, who have more control over the applicability of the law more so than anyone else.

h. In terms of Ben and Jerry's, I will likely ask that it terminate Mrs. Frederiksen and Mrs. Dobson's position and make a donation to the wounded warrior foundation with funds that it otherwise have to pay in taxes. Ben and Jerry's should never ratify any policies that discriminate against service members, nor should it employ individuals who do. The malicious schemes of Mrs. Dobson and Mrs. Frederiksen have made Ben and Jerry's rightfully liable for good cause, and the ice cream company should issue a public apology to service members.



i. For Marc Oswald, I might drop the lawsuit against him if he agrees to drop John Rich from his client roster. I agreed with Mr. Oswald's assessment in 2009 at the meeting when he attempted to bribe Mr. Ashley in secrecy, that Mr. Rich has done a few admirable things for communities. However, anyone with more than a second grade education can see that Mr. Rich is seething cancer to the Nashville community and his reign of abuse needs terminate. To begin, Mr. Richmoore, should be "no more." Mr. Oswald needs to give an opportunity to another artist, who will not misuse his celebrity to hurt others. This is the second time that Mr. Rich has caused Mr. Oswald to be sued under agency laws. That is an accomplishment that none of Mr. Oswald's other clients can come close to proclaiming, which should cause Mr. Oswald to clue in and send Mr. Rich back to the trailer park in Texas from which he came. While Mr. Oswald caught a break last time, no such leniency should be extended this time.

j. As for Channel Four News, I appreciate the channels of being a watch dog and the burden of having to provide content to your viewers. It is my immediate intention to nonsuit the lawsuit against Channel Four, not because I am placating to these misguided emotional liberals, but because there is a delicate balance at work in asking for restraint on speech and allowing overt slander to the point of injury. I ask that channel four news report fair and balanced news, not just sensationalism, because lives can be adversely impacted by the reckless reporting of half truths, as this case proves. The news is not above the law and is vicariously liable for being a vehicle of Mr. Rich's libel crusade in this case, has caused other people to incur liability that would not exist otherwise. The fact that Channel Four anchors would find Mr. Rich's lies to be credible whatsoever calls into question their competency and trustworthiness. The fact that Channel Four would be quick to discredit an attorney in response to Mr. Rich's theories is patently outrageous.

The next time Mr. Rich has something to say to Channel Four, I recommend that it be considered with caution and common sense, otherwise, they could have a minor on the hook for serious liability as is the case here. Most importantly, there needs to be laws passed that restrict the reporting of a criminal case until after a determination of guilt and innocence.

h. For Mrs. Meade, I will likely drop this civil lawsuit if she promises to stop abusing her prosecutorial powers and prepare's a statement that I could present to the Tennessee legislature so that these kinds of situations do not happen in the future. I think by far some of the most corrupt and dangerous people in America right now are prosecutors. This is because their is not adequate checks and balances over them. (Absolute power corrupts absolutely). A majority of the attorney's who work as prosecutors were at the bottom of their law school class, and yet, our states and government give significant power over people's lives. When I was a prosecutor for the United State's military, I was sickened to hear other prosecutors sit around and talk about how they could get their prosecutorial numbers up because the more convictions they got, the better their chances of being promoted were. There is something inherently evil about that, when the jail system is such a bastion of cruelty and dismal failure. Our prosecutors need to be champions of truth and not incentivized to get convictions, when they know that the other side has done nothing wrong. Mrs. Meade knew that there was no probable cause to support charges for either Mr. Rich or Mrs. Frederiksen's complaints. Yet, she allowed process to issue and has worked hand in hand with Mrs. McKenzie to drum up ways to make these knowingly false charges stick. This should cause her to be drummed out of the District Attorney's office and subjected to disciplinary sanction through the board of professional responsibility. Several Justices on the United States Supreme Court have expressed concerned over the lack of checks

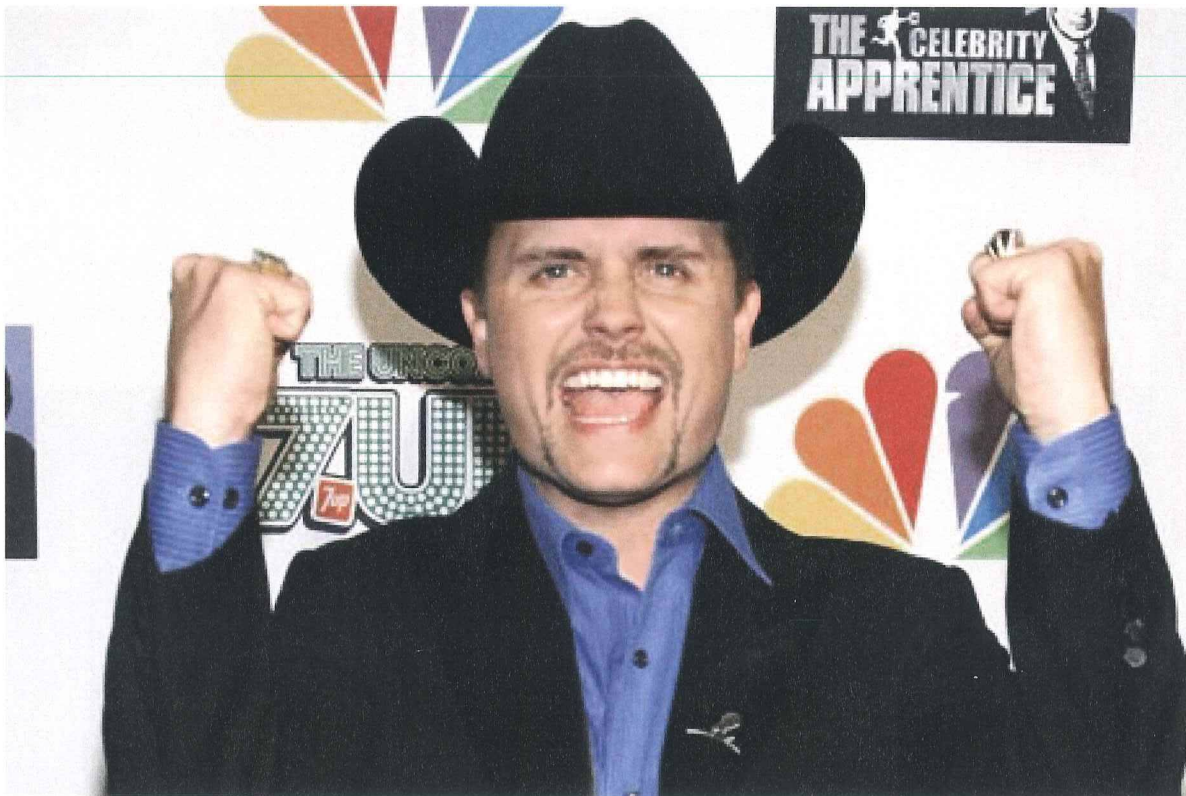
and balances over prosecutors, and the state and Federal legislatures need to be responsive to this legitimate concern. Otherwise, prosecutors will be viewed as discredited agents of politics and not representatives of the people for good cause. The only thing that Mrs. Meade has accomplished so far is that she is victimizing people by abusing the powers of her office that she is in capable of managing. What kind of assistant district attorney thinks that it is smart to falsely charge an attorney of such ridiculous crimes as "aggravated stalking?" One that lacks sound judgment and basic character. Mrs. Meade has proven so far to be just another hostile soul, who disgraces what the District Attorney's office was supposed to stand for.

**THREE PRIOR ACTORS:** There are three characters at play in this Hollywood movie.

8. The first character in this movie is the classic villain, celebrity Apprentice winner, John Rich, who gives new meaning to the terms self-entitled-paranoid-narcissist. Mr. Rich and I have been in litigation with each other for the past 5 years. Its cost him millions through out of pocket expenses, missed opportunities, and payouts to charities to clean up a bad reputation I exposed. St. Jude's can thank me more for the donations Mr. Rich gave them than it can Mr. Rich. The only thing that Mr. Rich has been able to prove after five years of litigation is that he is has successfully caused his partners to be sued and that his ego is extra expensive. In November 2010, Mr. Rich filed a frivolous malicious prosecution lawsuit against me, a Court Officer, which he used as a launching pad to falsely accuse me of stalking, which was followed by a smear campaign that all of the defendants played a roll in or capitalized on in the defiance of the law. Mr. Rich engaged in these unprotect atrocious forms of "payback" in part to secure contracts and further partnerships with T.V. Guide, CBS Corps, Marc Oswald, and other entities,



which makes all of them answerable to me personally in this Court. Mr. Rich needs fails to realize that winning is not like winning the Celebrity Apprentice. The law and facts control, not money and politics. Mr. Rich was worried about what my accusations against him would do to his political aspirations, which are predicated on his counter productive desire for power for powers sake. Mr. Rich is certainly not interested in politics because he is concerned with the well-being of man kind, like I am See the Apple lawsuit.



(Mr. Rich)

9. Nila Frederiksen, actor 2, is the opportunistic fashion model with lofty aspirations, who elected to thrust herself into this conflict by jumping on the bandwagon that Mr. Rich and Mrs. McKenzie started and that the police, district attorney, and news wrongfully enabled through one sided reporting. Mrs. Frederiksen did not act alone in crafting that scheme, she had the help of

Mrs. Dobson and her misguided father. As much as I wanted to believe that Mrs. Frederiksen was simply duped by Mr. Rich through the media, her statements in the police report and her affidavit for an order of protection are overly dramatized, which is evidence that she acted in bad faith in building a platform for exposure. Although Mrs. Frederiksen plays the minor card, she is commercial model who regularly shoots seductive commercial work for cash. She and Mrs. Dobson just made up the stalking bit against me to cash in on adding opportunity and meaning to otherwise trivial and insignificant lives.

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<http://macsamax.com>



(Opportunistic actress/model)

10. Actor 3, is myself. Although the evidence proves that I am not a stalker, what the evidence does show is that I carry a JD from Vanderbilt, that I graduated from Vanderiblt with a degree in politics, that I am a former combat Judge Advocate, that I am the former CEO of an Indi-label, that I am an EDM artist, overseas missionary, fashion model, and whistle blower, who has set out to help the greater good. The evidence shows that I have made Mr. Rich spend hundreds of thousands in legal fees, and that he is angry about it. Why any of these people from Bill O'Reilly to Justus Dobson thought it was a good idea to trample dishonor a Court officer is beyond me. I

would not want someone like me as my enemy in the courts.

[soundcloud.com/ghostwars](https://soundcloud.com/ghostwars)





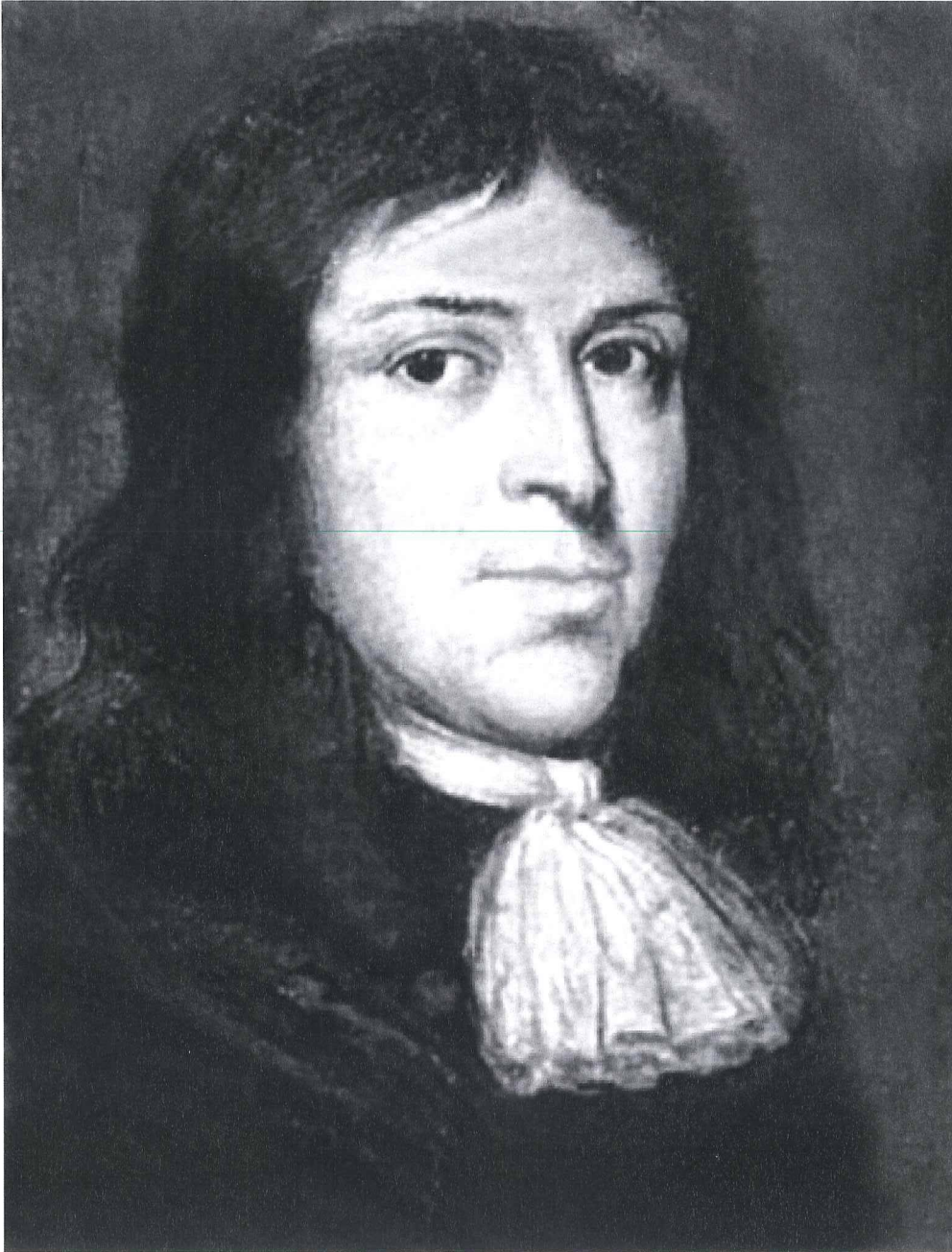


(the whistle blower)

### **WITCH HUNT**

11. The individual Defendants name here, collectively, with the help of the police, district attorney's office, and the news set out or caused to set out to paint me as a "stalker" for ulterior purposes that is without legal basis. The fact that the police and media outlet embraced their reckless falsities against an attorney, offends common sense and speaks of terrible systematic flaws that should be curbed by the state legislature to restore a culture of honor. This situation is similar to the Salem Witch hunt, where there was mislabeling and persecuting to suit invalid agendas. In this case, Mrs. Frederiksen, Mr. Rich, Mrs. McKenzie, and Mrs. Dobson represent Abigail and cousin Betty. Mrs. Hodges, Mrs. Meade, Mrs. Yandle, and Mr. Scarbrough resemble Samuel Parris, who have ulterior motivations in casting people as things they are not.





**DISCRIMINATION AGAINST WOUNDED WARRIOR COMPONENT**

12. One thing present in this case that is intolerable is the willful discrimination against combat veteran, which dishonors all service members. All members of the military would be outraged if



they knew how Mrs. McKenzie and Mr. Rich set out throughout Mrs. Hodges to use the Tennessee Supreme Court to ratify discrimination practices to accomplish ulterior purposes that were not supported by law. Accordingly, I am hoping that the Legislature will pass a law that criminalizes discrimination against a combat veteran or veterans wounded in combat to deter this kind of thing from happening again. Here is the story:



### FACTS

13. I first came to Music City from Alabama several years ago, when I was playing and songwriting for the Pierce Sisters. Our the band signed a record deal with Epic.

14. Subsequently to that deal, I started producing and songwriting for Eliot Morris. He signed to Strummer Universal, and toured with artists like, John Mayer and Counting Crows.

15. In response to those accomplishments, I opened an indi-label on music row, severerecords.com, signed a bunch of artist and started and writing and producing records with them.



16. Three of the artists I signed, Chance, Damien Horne, and Shanna Crooks, went on to sign either a publishing or management deal with John Rich in 2005.

17. Ever since he arrived in Nashville, Mr. Rich has acted as an extremely insecure, greedy, hot-headed, who is jealous of persons with more talent than himself. Mr. Rich moved from the Texas Trailer park to Nashville. He was able to achieve a high school diploma from a third tier high school in Tennessee.

18. Mr. Rich was jealous of me for having produced and written records with and for Damien, Shanna, and Chance. This caused him to form a bizarre grudge against me that played itself out through ruthless antagonism against myself and my artists that generated these 12 lawsuits.

19. What Mr. Rich failed to comprehend was that this situation we were in was analogy to the contractual dealings of Geffen Records, Subpop Records, and Nirvana. Subpop Records signed Nirvana first and made "Bleach." Subsequently, Nirvana went on to sign with Geffen and made "Nevermind," but that did not give Geffen Records and interest in "Bleach," neither did it give Subpop and interest in "Nevermind."

20. Mr. Rich and I have never had a contract, and what Mr. Rich lacked in regards to myself was privity of contract.

21. Mr. Rich was well aware that we lacked privity but did not care because he had sell out attorneys, like Jess Rose and Mrs. McKenzie, who enabled him to operate above the law.

22. Mr. Rich starts conflict regularly in Nashville. Mr. Rich delighted in running people out of Nashville, who he perceived to have a competing interest with him.

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23. John Rich started this entire conflict, that has ultimately caused all of the parties named here to include liability, when he first emailed in 2005.

24. Mr. Rich stalked down my email address and emailed me first, starting settlement negotiations that I merely continued in the Spring of 2012 and 2013 in keeping with the spirit of settlement law.

*(For clarities sake, John Rich's words are in "red," my words are in "blue," Jason McKenzie's words are in "green," and Cyndi McKenzie's are in "brown." Additionally, I will be quoting the Bible to help frame the emails, since this lawsuit has a lot to do with pushing our culture back to a place of honor and rationality. The Bible pretty much defines reality, and I'm so tired of the lies that I think its time to start pumping some truth back into the justice system)*

25. *As charcoal to embers and as wood to fire, so is a quarrelsome person for kindling strife.*

*Proverbs 17:16*

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The first email I received from Mr. Rich came in 2005 entitled "Illegal Activity." The email read:

**Date: Sat, 22 Oct 2005 20:57:09 +0000**



From: John Rich <[johnrichfans@hotmail.com](mailto:johnrichfans@hotmail.com)>

Reply-To: John Rich <[johnrichfans@hotmail.com](mailto:johnrichfans@hotmail.com)>

Subject: Illegal Activity.

To: [Chris.sevier@vanderbilt.edu](mailto:Chris.sevier@vanderbilt.edu), [enalphin@comcast.net](mailto:enalphin@comcast.net), [marc@landofos.net](mailto:marc@landofos.net),  
[cory@muzikmafia.com](mailto:cory@muzikmafia.com), [scc07@aol.com](mailto:scc07@aol.com),  
[johnrichfans@hotmail.com](mailto:johnrichfans@hotmail.com), [rosenj@gtlaw.com](mailto:rosenj@gtlaw.com)

Jess and Gentlemen of the Muzik Mafia,

If you will go to the site [www.sevierproductions.com](http://www.sevierproductions.com), you will find a person by the name of "Chris Sevier" who is illegally selling music on Mafia artists that he has obtained without permission from the publishers, that being us, BIG\$RICH. The artists that are being exploited are as follows:

Mr.D

Chance

Shanna Crooks

Jess, I am copying Mr. Sevier on this email, and I would like you to contact him with an order to cease all exploitations and sales of these artists listed on his sites. His email address is [chris.sevier@vanderbilt.edu](mailto:chris.sevier@vanderbilt.edu)

Sincerely,

John Rich

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26. (*"And Starting a quarrel is like opening a floodgate, so stop before a dispute breaks out."*

*Proverbs 17:14.*)

Mr. Rich's intent was to bully me out of my copyrights. Mr. Rich knew that my deals with these artists pre-existed his.

27. Mr. Rich regularly hires people, like attorney Jess Rosen, to hurt others, knowing that he is violating their rights to suit some purpose that benefits him.

-----Original Message-----

From: Sevier, Mark Christopher [mailto:[mark.c.sevier@Vanderbilt.Edu](mailto:mark.c.sevier@Vanderbilt.Edu)]

Sent: Friday, October 28, 2005 10:21 AM

To: [kenalphin@comcast.net](mailto:kenalphin@comcast.net), [marc@landofos.net](mailto:marc@landofos.net), [cory@muzikmafia.com](mailto:cory@muzikmafia.com), [scc07@aol.com](mailto:scc07@aol.com),  
[johnrichfans@hotmail.com](mailto:johnrichfans@hotmail.com), [rosenj@gtlaw.com](mailto:rosenj@gtlaw.com)

Hey Brothers,

thanks John for sending me this email also. Not to get off the subject, but the deadwood show on CMT was killer; I saw it last night. In terms of the instant issue, I think it was inconsiderate for

me to not let you know that I would be putting these joint works up for sale. I could give you some excuses explaining why, but instead will just say "sorry." I can understand your reaction and the adverse perception that it could create by simply "discovering" this.

However, my chief aim is to help, not harm, Chance, Damien, Shanna, yourselves, my entity, and all the artists I work with- seeking to "love everybody" so to speak (no pun inten[d]ed) especially God and my wife. In terms of the fun legal issues, I do possess certain own[er]ship rights in the sound recordings as a producer and a fiancer that are posted and up for sale as well as certain ownership in the compositions as a co-author. I have them up for sale, not only because title 17 gives me the right to but because I believe this is in the collective best interests of all - you included. I did not create those works under a work for hire agreement, nor did I make them just for fun, nor did I receive any payment for them, but did create them to generate mutual benefits and to help further everyone's careers, especially the artists - its kind of the main goal of my entity. And believe me I'd much rather do this than be an attorney when I graduate from Vanderbilt Law School in May. I do absolutely have the responsibility to account for any proceeds that get generated to the artists as well as the publishers - you guys. This includes the statutory rate for the compositions as well as payment to the artists for their portion of the sound recordings. I can give an account immediately, but don't brace yourself cause the return has been less than nominal. In fact, we could all get lunch at SACCO on me and the proceeds from the cd sales would barely cover the tip. But in all seriousness, as a staunch Christian, I hope that anything I do creates positive effects and hope to help those who are brave enough to work in the muzik business that do not have nepotism working for them. Feel free to contact me at any time about any issue: (615) 500-4411. Many Thanks.



With Much Respect and Appreciation,

Chris Sevier

*(For where jealousy and selfish ambition exist, there will be disorder and every vile practice."*

*James 3:16)*

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28. My intent has always been to keep the peace, without allowing myself or my artists to be run over by Mr. Rich's unwarranted entitlements.

29. In response to Mr. Rich's cease and desist letters, I got one of my attorney friends, Collin Brown, to respond in opposition, establishing that Mr. Rich's demands were meritless.

30. On May 4, 2006, several months after the first wave of cease and desist letters arrived, John Rich emailed me:

From: John Rich

To: Chris Sevier

Quoting John Rich <[johnrichfans@hotmail.com](mailto:johnrichfans@hotmail.com)>:

Mark,

When Shanna signed her pub deal with my company, her deal included a

"Schedule A" which included all the songs she had written before our

agreement. That includes the ones you are trying to market. As her publisher, I will not grant you liscence to sell and or distribute any of her music at this time. Thank you for your cooperation.

Sincerely,

John Rich

*(Proverbs 29:11 "A fool gives full vent to his spirit, but a wise man quietly holds it back.")*

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31. By this point Mr. Rich was only concerned with Shanna Crooks copyrights, not Damien and Chance's as before.

32. Damien and Chance had accused Mr. Rich of acting fraudulently in the prior demands, so Mr. Rich was just interested in confisacting Mrs. Crooks' copyrights that severe records and I owed.

33. The fact that Mr. Rich assumes "cooperation" in the email is part of his self-entitlement syndrome that has made him a menace to the community of Nashville for years.

34. I response to Mr. Rich's unwarranted demand:

---Original Message-----

From: Sevier, Mark Christopher [mailto:[mark.c.sevier@Vanderbilt.Edu](mailto:mark.c.sevier@Vanderbilt.Edu)]

Sent: Thursday, May 04, 2006 1:49 PM

To: John Rich

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Cc: shanna@shannacrooks.com; Collin Brown; chris.sevier@vanderbilt.edu

Subject: Re: Shanna Crooks.

John,

Respectfully, its not "her music": its "ours". I'm a co-author for the songs that I'm referring to - "Better" and "Watching Me Leave," having copyright ownership in two distinct copyrights: the underlying composition and the sound recording jointly with Shanna, since I did not require that she work under a work made for hire agreement; therefore, I do not need your permission to exploit "my" or should I say "our" songs. As a joint tenant in common of the works, I do, however, have a duty to account to your publishing co and the co-writer for your and her prorated portion of any proceeds in the event that I exercise my right to exploit under 106. I'll definitely do that. I'll deal with Dwight concerning that if ok with you. In fact, Shanna's contributions to the two songs in question are relatively diminimus compared to mine, especially on "Better," I basically just gave her credit one the derivative version that we did because I'm cool like that. lol. Most importantly, I've got tons of respect for you and any artist I work with, but when it comes to Severe Records, its important that I start getting into the practice of following the business judgment rule or I could be held liable to the owners, its shareholders whom I'm starting to attract. I think it is in SevereRecords best interest to put these works to use as intended, like yourself I don't record write and record for just fun. By the way, just curious, have you heard the songs I'm referring to? I think they sound killer and think they sound better than almost anything else I've heard her do, but I guess I'm probably biased.

Many Thanks,

All the best,



Chris

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35. My intention was to be a peace maker, but not let our rights be trampled on by a man with short man's complex.

36. (*Proverbs 21:24 The proud and arrogant person—"Mocker" is his name— behaves with insolent fury.*)

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Mr. Rich retorted:

-----Original Message-----

From: John Rich [mailto:[johnrichfans@hotmail.com](mailto:johnrichfans@hotmail.com)]

Sent: Thursday, May 04, 2006 6:33 PM

To: [mark.c.sevier@Vanderbilt.Edu](mailto:mark.c.sevier@Vanderbilt.Edu); [dwiles@smithwiles.com](mailto:dwiles@smithwiles.com)

Cc: [shanna@shannacrooks.com](mailto:shanna@shannacrooks.com); Collin Brown; [chris.sevier@vanderbilt.edu](mailto:chris.sevier@vanderbilt.edu)

Subject: Re: Shanna Crooks.

Chris:

I find your position with my company and Shanna Crooks to be evasive, misleading, and disrespectful. Should you continue in this course of action without producing contractual evidence that you do, in fact, have a right to sell and distribute Shanna's music, I will serve you with a cease and desist order.

Please send all future comments to either my business manager, Dwight

Wiles:

615-594-7424

Or, my attorney Jess Rosen: 678-553-2100.

---

John Rich

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37. Mr. Rich's intent was clearly to intimidate me out of copyrights that pre-existed his deal with Mrs. Crooks.

38. Mr. Rich's threats were a form of theft in kind and amounted to extortion.

39. John Rich believes that if your interest do not align with his, then you are "evasive, misleading, and disrespectful." When the reality is that if your interest do not align with Mr. Rich's, Mr. Rich becomes "evasive, misleading, and disrespectful" in trying to hurt you for not giving into his self-serving demands.

40. (*Proverbs 15:18 "A hothead starts fights; a cool-tempered person tries to stop them."*) I responded to Mr. Rich:

From: "Sevier, Mark Christopher" <[mark.c.sevier@Vanderbilt.Edu](mailto:mark.c.sevier@Vanderbilt.Edu)>

To: John Rich <<[johnrichfans@hotmail.com](mailto:johnrichfans@hotmail.com)

Subject: breath in and out/you've got to love drama

Date: Thu, 4 May 2006 19:44:08 -0500

John,

Sorry you feel that way. Just let me deal with Dwight on these issues .I wish you did not think that our interest here were adverse: there're not. I exploit, we all benefit that's my reading of my right and obligation. In terms of your company, if have no interest in that. I've got interest in songs I've written and recorded at my studio for artist that you too happen to work with in some capacity, albeit subsequent to our dealing in the case of most of them. I've got a mountain of evidence that I am the writer and producer of the two songs in question, having the only existing hard drives of the sound recording work, having pitched the material to other artist prior to the one who assigned her publishing interest to. Writing and producing is what I do, besides being a law student - which I'll graduate in a week so wish me luck. I'm simply applying what I know to be the case based on statutory authority, common law, contracts, and so forth. I received Jess' cease and desist letter awhile back. Me and two lawyers analyzed it and determined that it did not carry any weight. Man he gets fired up though. He's got a reputation for being that way and actually violated rule 4 of the modern rules of professional responsibility in dealing with me - I could have gotten him written up and still can. Yet, screaming loudly and being right based on laws of the jurisdiction that apply do not always go hand in hand. Drama and acts of frivolous intimidation are not persuasive to me. What's funny is that I am not trying to be hostile in anyway whatsoever. Also, in terms of standing, my agreement and dealings were with Shanna and not yourself, although she did subsequently license you a portion of her interest, but only in the underlying compositions. So, I probably should just deal with her and let her account to you



for what ever she owes your entity. Since you like [to get] all hot and bothered about things, I could technically come after you under unjust enrichment, quantum meruit, tortious interference, and infringement (if you did not allow me to exercise my exploitation rights), but that would be a drag, and I've got way too much respect for leaders like you. I know that your doing what you think is right - but let Dwight handle it because of his knowledge and experience. I'd delegate to him rather than Jess because he's is so hot headed that he's likely a zealous advocate for his advancement at Greenberg Traurig and his pocket book and not yourself. Please don't be offended by this email's contents, it's that to me, this case is not an uncommon or difficult, and most publishers would understand that and not be antagonistic. By the way, I saw you perform at the Grammy after party and thought it was really good. I thought you and Big K represented Nashville well.

All the best,

Chris

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41. Clearly my intent was to keep the peace without allowing Mr. Rich to trample on our rights.

42. (*"A fool's lips walk into a fight, and his mouth invites a beating."* Proverbs 18:6) Then Mr. Rich threatened:

----- Forwarded message from John Rich <[johnrichfans@hotmail.com](mailto:johnrichfans@hotmail.com)> -----

Date: Fri, 05 May 2006 06:43:51 +0000

From: John Rich <[johnrichfans@hotmail.com](mailto:johnrichfans@hotmail.com)>

Reply-To: John Rich <[johnrichfans@hotmail.com](mailto:johnrichfans@hotmail.com)>

Subject: RE: breath in and out/you've got to love drama

To: mark.c.sevier@Vanderbilt.Edu, dwiles@smithwiles.com, shanna@shannacrooks.com

Chris:

I will be monitoring your activity closely with Shanna Crooks' music regarding sales and distribution. I suggest you go ahead and file a lawsuit against myself and my company and let's take this to court. I will defend my position to the ultimate end. In the meantime, consider your ties severed with me and all of my affiliates.

John Rich

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43. By saying that I was cut off from his "affiliates" in the email, Mr. Rich was threatening to take self-help measures to defame me if I did not comply with his demands.

44. (*He who restrains his words has knowledge, And he who has a cool spirit is a man of understanding.* Proverbs 17:27) In response to Mr. Rich's threat to have me severed from his affiliates, I responded:

-----Original Message-----

From: Sevier, Mark Christopher [mailto:[mark.c.sevier@Vanderbilt.Edu](mailto:mark.c.sevier@Vanderbilt.Edu)]

Sent: Saturday, May 06, 2006 4:59 PM

To: Collin Brown

Subject: Fwd: hey

To <[johnrichfans@hotmail.com](mailto:johnrichfans@hotmail.com)>

you crack me up man. I'll make sure Dwight and you can monitor all activity closely regarding the sale and distribution of songs I wrote and produced for artist you've got an interest in.

Accounting is easy. Thankfully, no need for me to file a law suit at this time, but I appreciate the suggestion. In terms of severed ties, I don't mean to be disrespectful, but don't flatter yourself. Do what you need to do, but don't commit intentional defamation. As much as I would love to get in a pissing match with you, neither of us should have the time for that sort of thing. I do need Dwights digits again por favor because I think you gave me yours by mistake, not his. Also, I really don't know why you would not want these works at issue put to use because you'll benefit in ways that you wouldn't otherwise, and so will the artists. It might be the case that your like me - a quasi-control freaks in recovery - but I think the artist and tunes sound great, having been recorded with some of the bestNashville has to offer. The work you do for the artists at issue is obviously incredibly positive, but I too aim to help them and might be able to push from different angels that you cannot. For example, I'd love to push Damien to places like Geffen or Sony/Columbia BMG New York, just to name a couple, to folks whose ears I've got and to places that might constitute a good fit. But if you have any concerns that I'm not aware of that are against your interest or thea rtist in any form, let me know and I'll try to remedy the situation the best I can, but just as your primary loyalty lies with your entity and its affiliates, mine is with Severe Records and our affiliates. Please, keep writing good songs like always and setting a good example, and I'll try to remember that"blessed are the peace makers" and not get to attached to the works I've created. Hit me up any time man, and thank you for making a difference in the music business in Nashville and beyond.

---

45. My intent was to keep the peace then and not be trampled on in to the same extent that it is now.



46. (*Proverbs 19:28 "A corrupt witness mocks at justice, and the mouth of the wicked gulps down evil."*) In April 2007, Mr. Rich had his attorney at the time, Jess Rosen, send me this basis less threat, which was all a part of Mr. Rich's intimation tactics.

**VIA EMAIL: – mark.c.sevier@vanderbilt.edu  
AND severerecords7@yahoo.com  
AND FEDEX – PRIORITY DELIVERY**

Mr. M. Christopher Sevier  
Severe Records, LLC  
1602 17<sup>th</sup> Avenue South  
Nashville, TN 37212

**Re:   Infringement of Intellectual Property Rights  
      of John Rich and Shanna Crooks  
      (Our File No.: 082887.01000.005)**

Dear Mr. Sevier:

This law firm represents John Rich and Shanna Crooks. This letter is further to our correspondence of October 24, 2005 and October 25, 2005, regarding your infringement of our client Muzik Mafia's rights.

Despite our previous warnings, it has come to our attention that you are distributing bootleg CDs and unauthorized downloads throughout the internet, which contain the performances of Shanna Crooks, and may include musical compositions owned by John Rich and/or Shanna Crooks. Your distribution of these materials is without authorization from, or compensation to, Mr. Rich or Ms. Crooks. In addition, you are fraudulently advertising that Shanna Crooks is a Severe Records recording artist, who is currently writing and recording songs for your label. At the risk of overstating what should be glaringly obvious to you, these audacious statements are patently untrue. Furthermore, you are using Ms. Crooks' name, image and likeness without her authorization, in violation of her privacy and publicity rights. For the reasons set forth below, we are hereby placing you on notice that if your willful and outrageous infringement does not cease immediately, our clients shall immediately file suit against you for any and all available remedies.

As we previously informed you, federal copyright law prohibits the fixation, distribution and sale of "bootleg," or unauthorized, audiovisual recordings without the consent of the performer, as well as the unauthorized reproduction, distribution and performance of copyrighted works. Further, federal copyright law and federal and state trademark laws prohibit the distribution and sale of unauthorized merchandise such as this, because such conduct violates the exclusive rights of the copyright owner(s) and intentionally creates the impression that the artist sponsors, is associated with or endorses your distribution of such merchandise. Such offenses carry penalties including imprisonment, statutory damages, actual damages, treble damages, profits, costs and attorneys'

rees. Furthermore, since your conduct is now clearly willful, statutory damages may be increased to as much as \$150,000 per infringement.

We have also previously informed you that your conduct constitutes false endorsement under the federal Lanham Act and deceptive business practices under state law (in this case, Tennessee Code Sections 39-14-127 and 47-18-104). The laws provide broad remedies for such violations, including injunctive and monetary relief.

Furthermore, virtually all states, including Tennessee, prohibit the unauthorized commercial use of the name, image or likeness of an individual. The right of an individual to prohibit such unauthorized uses is commonly referred to as the "right of publicity." The sale or advertisement of merchandise bearing a celebrity's name, image and/or likeness without first obtaining permission directly violates a celebrity's publicity right. Your sale of unauthorized recordings bearing Ms. Crooks' name and image constitutes a blatant violation of her right of publicity. The remedies for violation of an individual's right of publicity may include injunctive relief, actual damages, punitive damages, and all profits associated with the infringing activity.

At our clients' request, a copy of this letter is being forwarded to litigation counsel for John Rich and Shanna Crooks. If we do not receive **by 5 pm EST on April 27, 2007** your written agreement to immediately and permanently cease commercial exploitation of sound recordings featuring Shanna Crooks and fraudulent claims that she is a Severe Records recording artist, our clients will, without further notice to you, promptly file a lawsuit against your company, you personally, and anyone else involved in the aforementioned illegal conduct for any and all claims available under all applicable federal and state laws. We would seek, without limitation, actual damages, punitive damages, statutory damages, a permanent prohibitory injunction, and a mandatory injunction requiring you to advertise on the internet and elsewhere that the sale of the recordings has been withdrawn on the grounds that such sale was fraudulent and otherwise illegal.

This letter is without prejudice to any of our client's rights or remedies at law or in equity, all of which are expressly reserved.

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47. Mr. Rich hired a lawyer to bully me out of my copyrights, which is a form of fraud and theft.

48. Unable to scare me into compliance with his unfounded demands, Rich employed his Muzik Mafia associates to start maliciously harassing my artist and myself. This included property damage, assaults, libel, intimidation, and so forth. All of which we documented.

49. Mr. Rich offered to pay Bill Morre to assault me at a night club, and promised to pay Mr.

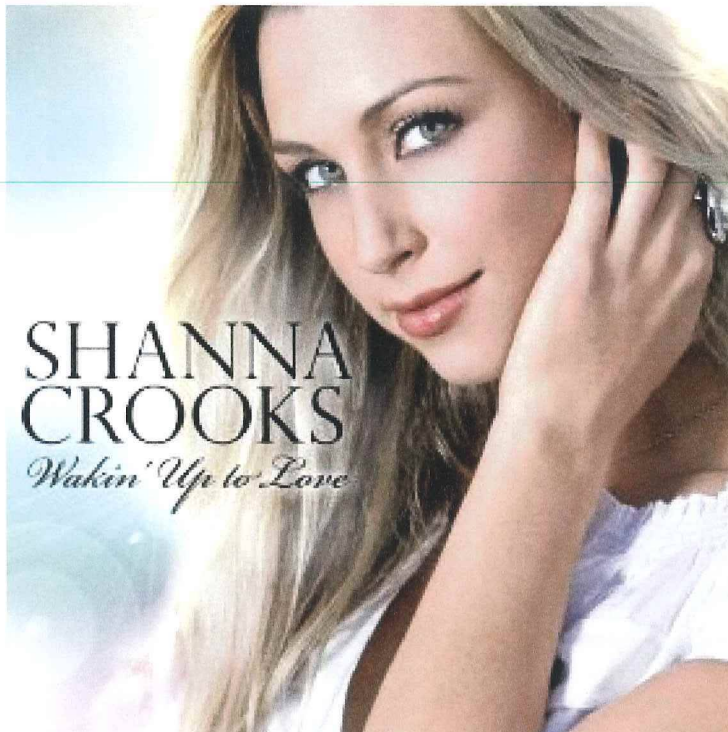
Morre's bond after he was arrested. In the summer of 2006, I was assault by Mr. Morre at Dan

McGuiness in night club in Nashville. I did call the police. But in the end, I did not press charges



because I do not have time to fool with trivial conflicts of this nature. Years later, Mr. Morre sought me out and apologized for what he did when he was working with John Rich. We became friends. I did somethings to help his business and allowed him to use my car when I relocated to New York. He later confessed these things to me, and is willing to testify to this effect at trial.

50. FIRST MAJOR DEFAMATION IN THE PUBLIC:



*(Proverbs 29:10 The bloodthirsty hate a person of integrity and seek to kill the upright).*

On July 25, 2007 Mrs. Crooks and Mr. Rich took a self-help measure and published 15,000 copies of this defamatory email to members of our prospective talent pool stating:

On July 25, 2007, Shanna Crooks, an agent of Mr. Rich, sent out 15,000 libelous emails stating:  
(See Exhibit)

"WARNING!!! Illegal music being sold on my  
page."

Hey Everyone, I apologize for the inconvenience this post may

cause. I went to my myspace page today and to my astonishment saw I had music for sale! I don't know how this music got there but I had nothing to do with it.

There is a guy named Chris Sevier who writes with artists, records "demo's" of the songs they write and then without the artists' knowledge packages them up and sells them using unauthorized pictures, bio's, etc.

I co-wrote/recorded and payed for two songs with him, "Watching Me Leave" and "Better" a few years back. Chris Sevier immediately designed some fancy graphics and proceeded to sell them on every music site and through every avenue he could find.

He's continuing to do so after countless times of me asking him to stop. He claims it's legal since he supposedly "owns" the recordings, but this is clearly wrong, unethical and down right dirty.

Well, it looks like good ole Chris is trying to earn a buck of my myspace page now. PLEASE DON'T GIVE IT TO HIM! In the very near future I will have my own music available and I promise you it will be music that will represent who I am as a singer/songwriter, as opposed to these demo's being sold by him.

If you are an artist, BEWARE of people like Chris. Sadly there really are snakes out there that will exploit and take advantage of you with no regard for business ethics, artists' wishes, or even their own reputation in order to make a buck.



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51. This email went was calculated to have prospective artist shun and avoid me and my label.

The emails were rife with false statements and were maliciously published concerning myself in my business capacity.

52. Severe Records lost some contacts that were pending as a result of this publication. For example, one of the ones we lost was for \$140,000 and another for \$25,000.

53. The emails were false and designed to paint myself and my company in a false light. Mr. Rich and Mrs. Crooks published the false statements as "payback" for not giving them what they wanted. Mr. Rich and Mrs. Crooks knew that I had produced the tracks and paid for the recordings. They were aware that I had either exclusively written the material or co-authored the tracks with Mrs. Crooks, like I have with countless other artists. Mr. Rich does not care about the rights of others, and this indifference makes him a liability to his partners.

54. The emails were away of John Rich and his associates of talking self-help measures and the same kind of fraud that Mr. Rich engaged in when he accused me of stalking.

55. (*"When a wise man has a controversy with a foolish man, The foolish man either rages or laughs, and there is no rest."* Proverbs 29: 9 ) I sent a notice demand for retraction, correction, and apology to Mr. Rich in compliance with the Tennessee Code to preserve the right to seek punitive damages. I was asking Mr. Rich to withdraw the libelous statements that Crooks was publishing at his direction.

56. In response, Mr. Rich sent this harassing email:

**Pitiful.**

Sunday, August 26, 2007 3:46 PM

**From:**

"John Rich" <johnrichfans@hotmail.com>

**To:**

To; Chris Sevier severerecords7@yahoo.com

**Cc:**

charliepennachio@aol.com shanna@shannacrooks.com  
Chris,

To be guilty of "defaming" someone, you have to say things about them that are untrue.

Everything Shanna has said about you is accurate and truthful. If you had not treated her, and other members of the MUZIK MAFIA so unethically, there would be nothing for anyone to say about you, good, bad or otherwise. You have always behaved like a bottom feeder, and you still are. Your business practices are shady at best, and you are not to be trusted. You will receive an apology from no one. People like you are bad for our business. Period. You degrade the level of quality and reputation we have EARNED in the music business, as being people with undying respect for the writers and artists, and the music they make. Everything about your practices in this town is rather disgusting to us to be perfectly honest with you. Keep sending us your humorous emails though, we REALLY enjoy getting those!! As always, we wish you the best of luck fighting for your share of the table scraps.

Warmest regards,

John Rich

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57. Mr. Rich not only did not issue the retraction, he made fun of me for sending it.

58. In Tennessee, a retraction demand for libel preserves the right for punitive damages.

59. On September 26, 2007, I emailed Mr. Rich

Wednesday, September 26, 2007 6:20 PM

**From:** "chris severe" <severerecords7@yahoo.com>

**To:** "John Rich" <johnrichfans@hotmail.com>

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We need your mailing address, as well as your agents/partners/employees/ and employers, including but not limited to these Shanna Crook's, Bill Moral's, Charlie Pennachio's, Muzik Mafia's LLC's , and your music publishers, as well as a list of your other subordinates, including the one who you sent to our property uninvited. We assume you are still represented by Jess. Let us know if that is otherwise.

---

60. What happens next in the story was, between July 2007 and June 25, 2008, our property at the label on Music Row was vandalized. Mr. Rich sent agents to our place of business to harass and threaten us, while we were there. Rich's Muzik Mafia continued a defamation circus, which hurt our income generating capacity. Mr. Rich aimed to teach us that "he was the boss" of Nashville. The Godfather was what he labeled himself. Meanwhile, I continued to turn the other cheek and tried to mitigate the lies and damages the best I could to protect our artist because I do not think Mr. Rich is not worth my time.

61. On June 25, 2008, Mr. Rich and Mrs. Crooks linked up with Gray Zone. Together, they contacted iTunes and falsely alleged that I was illegally selling Mrs. Crooks' music that Mr. Rich

claimed that he exclusively owned.

62. The affidavit read:



From: Shanna Crooks & John Rich

To: iTunes

To: Chris Sevier

Subject: URGENT - FIRST NOTICE OF INFRINGEMENT AND DECLARATION: SHANNA CROOKS [iTunes]

Reply-To: "Shweta Agarwal | GrayZone, Inc." <grayzone@grayzone.com>

NOTICE OF INFRINGEMENT AND DECLARATION

TO: iTunes

Music, Marketing, & IP Legal

Chandani Patel

1 Infinite Loop

MS:3-ITMS

Cupertino, CA 95014

mpd@apple.com

Copyright Agent

Sue Runfola

Apple Computer, Inc.

1 Infinite Loop, MS 3-TM

Cupertino, CA 95014

Phone: 408.974.9994



Fax: 408.253.0186

copyrightagent@apple.com

REGARDING: REMOVAL FROM iTUNES / UNAUTHORIZED SHANNA CROOKS TRACKS

The tracks entitled "Watching Me Leave" and "Better" are exclusively owned by Shanna Crooks and have not been authorized for sale at iTunes. Please remove these unauthorized tracks from the iTunes music service in an expedient manner:

Shanna Crooks "Watching Me Leave"

[http://ax.phobos.apple.com.edgesuite.net/WebObjects/MZStore.woa/wa/viewAlbum?i=250508887&](http://ax.phobos.apple.com.edgesuite.net/WebObjects/MZStore.woa/wa/viewAlbum?i=250508887&id=250508865&s=143441)

[id=250508865&s=143441](http://ax.phobos.apple.com.edgesuite.net/WebObjects/MZStore.woa/wa/viewAlbum?i=250508887&id=250508865&s=143441)

Shanna Crooks "Better"

[http://ax.phobos.apple.com.edgesuite.net/WebObjects/MZStore.woa/wa/viewAlbum?i=250508874&](http://ax.phobos.apple.com.edgesuite.net/WebObjects/MZStore.woa/wa/viewAlbum?i=250508874&id=250508865&s=143441)

[id=250508865&s=143441](http://ax.phobos.apple.com.edgesuite.net/WebObjects/MZStore.woa/wa/viewAlbum?i=250508874&id=250508865&s=143441)

I, the undersigned, do solemnly and sincerely declare and CERTIFY UNDER PENALTY OF PERJURY that:

1. I am the owner or an agent authorized to act on behalf of the owner of certain intellectual property rights, said owner being named SHANNA CROOKS ("IP Owner").
2. I have a good faith belief that the materials identified in the addendum attached hereto are not authorized by the above IP Owner, its agent, or the law and therefore infringe the IP Owner's rights according to the laws of the (check all that apply):

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63. The statements in the affidavit were signed under the penalty of perjury and were knowingly false.

Because of the false statements content that Severe Records and I owned was wrongfully removed under the copyright misrepresentations.

64. The copyright misrepresentation was actionable under section 512 of the Copyright Act.

65. The wrongful removal of our copyrighted work had major implications. At the time of the

removal, IODA/Sony alliance was the digital distributor for Severe Records artists, in response to the false affidavit, IODA terminated its contact with us that hurt all of my artists. Their termination letter read:

Dear Mr. Sevier

This letter is sent to notify you that, effective at the end of this month, we are hereby terminating the above referenced Agreement. You will receive a final accounting and payment from us in regards to all of your IODA distributed content activity.

Very truly yours,



Jonathan Earp  
VP Legal & Business Affairs

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66. At some point, when you are being attacked, enough has to be enough. There is a time for war and a time for peace. You can only be slapped in the face so many times. In fact, inaction in the face of certain types of evil becomes wrongful in itself, once too many lines are crossed. (This was the problem with Mrs. Hodges who refused to take on Mrs. McKenzie's misconduct which would have warded off this lawsuit if she had bothered to do her job.) I filed a Federal lawsuit against Mr. Rich and Mrs. Crooks for libel per se and under the FED Dec act on July 1, 2008, six days before I reported to TJAGLCS to begin deployment training to Iraq. In plain terms, Severe Records and I filed a lawsuit in which we asked the District Court to declare that our activities on iTunes and elsewhere were not infringing as Mr. Rich continued misrepresent.

IODA asked me to get a declaratory judgment to take back to iTunes so it could show that our activity was not infringing.

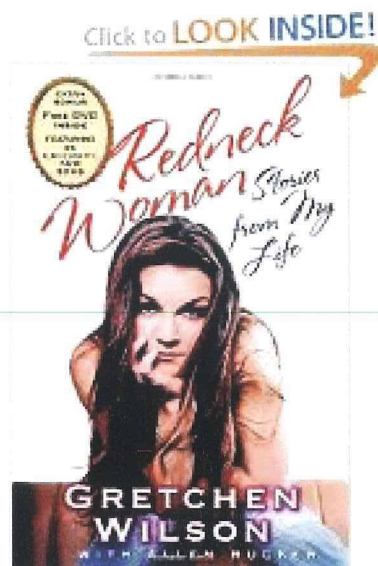
67. I did not file the lawsuit because I am vindictive person or because I am a bully like Mr. Rich. I filed the lawsuit because Mr. Rich is out of control and he was making it crystal clear that he would never stop harassing and bullying my label or myself until he got what he wanted. Because his syndrome makes him unable to let go of something that offends his ego. Mr. Rich's delusions of grandeur make him this way, which makes him a liability to anyone who thinks that is wise to partner with him.

68. Additionally, I filed the first lawsuit against Mr. Rich for another consideration. The reason I became a lawyer was the same reason I became a military officer and overseas missionary. I feel called to stand up for the weak and oppressed, as commanded in the Bible.

69. *Psalm 8:2 Defend the weak and the fatherless; uphold the cause of the oppressed.* Also, another factor that compelled me to file a lawsuit against Mr. Rich was that he was bullying countless other people in the community out of their copyrights just because he had the money and the dishonest attorneys to do it.

70. For example, Mr. Rich was not just trying to steal my copyrights during this time, Mr. Rich was also misappropriating Dawn Martins. Mrs. Martin wrote a song "Redneck County Girls," which she played regularly when opening shows for Mr. Rich. Mr. Rich took her song and

without permission converted into "Redneck Woman," giving Mrs. Martin no credit. Mr. Rich then went and surreptitiously recorded the song with Gretchen Wilson, and released the song on Sony.



71. After Redneck Woman was released on the radio, Mrs. Martin confronted Mr. Rich by email stating:

From: Dawn Martn ;[dawnmartinband@yahoo.com](mailto:dawnmartinband@yahoo.com);  
 To: John Rich ";[johnrichfans@hotmail.com](mailto:johnrichfans@hotmail.com);  
 Subject: redneck woman, redneck country girls.....whatever

;just wanted to let you know that i am not very happy about YOUR version of MY song. my phone has been ringing off the hook with my friends calling me about this chic who has ripped off my song ; "Redneck Country Girls";. Imagine my surprise when i actually heard the song and then discovered that her co-writer has actually HEARD my songs. ....not cool and you know it. i have no intention of causing a big stink about this but it could be a possible copyright



infringement. i have always wished you well and i still do but i really thought you were above  
";re-writing"; my songs.....dawn

72. Mrs. Martin was devastated by this copyright fraud committed by Mr. Rich. Music was Mrs. Martin's dream, and Mr. Rich effectively took that away from her to benefit himself. Mrs. Martin did not have the skills and means to stand up to Mr. Rich's dirty tactics.

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73. In response to Dawn's allegations that Mr. Rich infringed on her copyright Mr. Rich wrote:

From: John Rich <johnrichfans@hotmail.com>  
To: dawnmartinband@yahoo.com; marc@landofos.net; cris.lacy@warnerchappell.com  
Sent: Monday, April 5, 2004 11:49:50 AM  
Subject: RE: redneck woman, redneck country girls.....whatever

Dawn,

What a disappointing email to get from you. You really should think about the consequences of your accusations before you start slinging them around the internet. JR.

&

From: John Rich <johnrichfans@hotmail.com>  
To: dawnmartinband@yahoo.com  
Sent: Saturday, May 7, 2005 5:37:35 PM  
Subject: RE: christian roots

I'm a Christian, but my Jewish attorney is not. I'll be forwarding all your future emails directly to him. JR.

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74. Besides having anti-Semitic undertones, Mr. Rich demonstrated in his response the same pattern with Mrs. Martin that he did with myself and others. Mr. Rich commits terrible acts that

violate rights in complete disregard for the law, and then he hides behind corrupt attorneys, like Jess Rosen and Cyndi McKenzie, who have long since sold their souls for money.

75. I believed that by filing a lawsuit against Mr. Rich, I was standing up for people, like Mrs. Martin, who could not protect themselves from Mr. Rich's abuse. Additionally, I had a contractual and fiduciary duty to the 26 artist signed to my label to protect their legal rights from being trampled.

76. There are a total of 12 lawsuits that followed as a result from my simple Federal lawsuit against Mr. Rich. For clarity purposes, I label them lawsuit 1 - 12.

77. LAWSUIT ONE: SEVERE RECORDS V. RICH, MAFIA, CROOKS. On July 1, 2008, I took Mr. Rich's up on his offer in his email in May 2006 to "take him to Court" so he could litigate the matters to "the ultimate end." I filed a lawsuit captioned "Severe Records LLC, Chris Sevier v. John Rich, Muzik Mafia, and Shanna Crooks (Rich, Mafia, Crooks). In response, Mr. Rich hired Bill Ramsey and Cyndi McKenzie, from Neal & Harwell, a blue chip/white shoe firm grounded in pugilism, to play a good cop bad cop routine. The evidentiary record demonstrates that Mrs. McKenzie is the post child of slimy lawyer. Cyndi McKenzie is a deeply wounded creature, who Mr. Rich deliberately sought out because she is as nefarious as he is. They both suffer extensively from anger management and hardcore personal wounds that they have not recovered from. Besides being a meth addict and two time divorcee, Mrs. McKenzie's corruption becomes so bad in this story that it later compelled her husband to come forward to expose her as an obsessed fraud maker. It is her masterminded legal strategies that has compelled the parties to be named in this lawsuit. The state of Tennessee has done a great disservice to itself

and countless others by even allowing her to practice law, given the evidence of her corrupt dealings and abuse through the Courts. Mrs. McKenzie is only happy if she is hurting others, and she will go to great extremes to fabric any basis to put innocent people in jail as a way to give her dismal life meaning. She is more than just a danger to the legal profession, she is a danger to the community. Mrs. McKenzie's business model was, "if you pay her hundreds of dollars and hour, she will lie, cheat, kill, steal, and destroy to your opponent." She is the exact kind of attorney, who gives the practice of law a bad name and reduces the promise of the Courts to be held in contempt by the public.



*Cyndi McKenzie and Bill Ramsey above.*

78. Before we had our first appearance in Court, Mr. Rich spent \$170,000 responding and filing motions, lodged by Mrs. McKenzie and myself. Meanwhile, I spent zilch and learned was being

trained how to practice law at Mr. Rich's expense. *(This fact was established because Mr. Rich's attorney's moved for reimbursement of the \$170,000 fees they had swindled him out of without any benefit.)*

79. If Mrs. McKenzie was not so greedy, she would have convinced Mr. Rich to settle the lawsuit the minute it was served on him. But that did not happen because Mrs. McKenzie has no respect for other lawyers or the law. She is all about money. Consequently, Mr. Rich has caused the lawsuit to escalate to this level with Mrs. McKenzie's help that will cost everyone

80. A few months after I filed the Copyright lawsuit against Mr. Rich, in October 2008, Mr. Rich got in a fight with Chris Poggi. He then made a citizens arrest. To cover up the attack. (Classic Rich

81. The night after getting in a fight with Chris Poggie, Mr. Rich did this to Mr. Montano's face:





82. In response, Mr. Montano filed an assault civil lawsuit against Mr. Rich in Superior Court in California.

83. Cyndi McKenzie then flew to California and paid Mr. Montano \$25,000 off to drop the lawsuit and stay silent.

84. Mrs. McKenzie, herself, then violated her clients confidences by telling her husband Jason McKenzie all about the pay off - violating attorney client privilege.

85. LAWSUIT ONE: In January, I filed an affidavit of the recording artist Chance, in Federal Court that was adverse to Mr. Rich's interest. The affidavit, Chance pretty much pigeon held Mr. Rich as an abusive fraud, who suffers from short man's complex.

86. In response, Mr. Rich and his brother call Chance and sent him texts of the ways they were

going to physically hurt him. Chance reported Mr. Rich to the police for intimidation of witness and obstruction of justice. The police did not do anything. Chance met with the District Attorney's office, and showed them the text messages. The District Attorney's office was not responsive. Mr. Rich's threats gave me concern for the safety of my artist. I had first hand knowledge that Mr. Rich would pay people to physically assault my artists, after being attacked by Mr. Morre. I was also aware of Mr. Rich's fights in California and had good reason to be worried.

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87. FIRST RESTRAINING ORDER REQUEST IN FEDERAL COURT: In March 2009, I was the first to file a restraining order against Mr. Rich because he posed an actual physical threat to myself and my witnesses. I filed a preliminary injunction demanding that Mr. Rich stay away from myself and my artists, not because he was sending us emails to settle the lawsuit, but because he was making threatened phone calls, paying Muzik Mafia members to attack us, and fighting people regularly. He very obviously suffers from anger issues and is not more than a danger in theory. Mr. Rich was offended that I filed for restraining order and wanted to get pay pack for that.

88. ASSAULT OF JARED ASHLEY: For years leading up to the night of March 13,2009, Mr. Rich had been in conflict with Country singer Mr. Ashley. Mr. Ashley was a contestant on Nashville Star, when Mr. Rich was a judge. One night while Mr. Ashley was playing Legend's Corner on Broadway, Mr. Rich got drunk, climbed on stage, and assaulted Mr. Ashley in front of his fans because Mr. Rich thinks that he is above the law and better than everyone else. The same arrogance that convinced Mr. Rich that it was appropriate for him to climb on state with Mr. Ashley is the same that has caused all the parties to be named in this lawsuit.



89. Lions Gate, T.V. Guide, and CBS Corp should understand that Mr. Rich has total disregard for anyone but himself. By enabling T.V. Guide, Lions Gate, and CBS Corp is setting him up to be a danger to other people whose interest do not align with his in the future.

*"Wine produces mockers; alcohol leads to brawls. Those led astray by drink cannot be wise."*

*Proverbs 20:1.*

90. On March 13, 2009, Mr. Rich and Mr. Ashley were Mr. Rich's bar, the Spot. Mr. Rich reached around his body guard and punched Mr. Ashley in face around 2am.

91. Danny Basham was present that night and witnessed the event. Mr. Basham was the designated driver that night. He provided an first hand account of seeing Mr. Rich punch Mr. Ashley in the face, which he later memorialized in an affidavit. Robert Smith, Mr. Rich's former bodyguard, before 69 attested in an affidavit that Mr. Rich reached around him once and punched a third party at Mercy Lounge.



92. A few hours after the incident at the spot, at 6AM, Mr. Rich and Sebastian Bach called Mr. Ashley to intimidate him into not reporting the attack that just occurred. The statements left by Mr. Rich were similar to the ones he made to Chance a few months earlier that were memorialized in Chance's affidavit.

**93. SKID ROW ENTERS THE STORY - THE PHONE CALL:**



Here is what Mr. Rich and Mr. Bach said on Mr. Ashley's answering machine:

- a. Sebastian Bach stated: "Hey Jared, How's it going? Umm... I'm not a guy who lives in Nashville, Tn...And I heard some stories about how you f\$@ked with my friend ... And uhh, you best be careful, if your gonna mess with some people...Your gonna, someday mess with the wrong motherf^@kers."
- b. John Rich---background - stated, "Give me that phone."
- c. Sebastian Bach asserted: "And you don't wanna do that."
- d. Defendant Rich took the phone from Mr. Bach and stated: "Hey Jared it's John Rich...I hope you show this up in court at some point.. .Because uhh... you will play this recording against my testimony, which is that you broke into my house ... And the



gall that you showed tonight. .. you little son of a b\*tch! To show up in my bar and drink for free...and actually have the nerve to walk up to me out on my rail. .. I have never in my life seen somebody with such a lack of respect and lack of reality .. .in their lifetime actually come up to me. Maybe you don't understand who your talking to do it again! I treasure the moment that Jared Ashley walks up to me again...brother... You broke into my house.....and you've admitted to it. ..and we can put that in court...I've got a couple of friends here that aren't too happy about it.. .one of em here right now uhh ... is got a big ole cowboy hat on ... wants to say one more word to you maybe you'll recognize this voice ... Peashooter. .. here he is!

e. Sebastian Bach picked the phone back up and threatened, "All I can say little boy is one thing...Don't sh^t where you eat!...that's all I can say...Don't take a sh^t where you eat! This is your town...but there's other people that don't appreciate your f^@kin attitude...and don't take a sh\*t where you f#\$king eat!

f. Defendant Rich then took the phone from Mr. Bach and asserted: "Jared, this is John Rich... one more time... let's put this in court...we can play this back right in the middle of everybody...brother...I'm gonna knock the sh\*t outta you!

g. Sebastian Bach---background, stated, Yeah, I'll f^@kin do it too!

h. Defendant Rich stated, "Your lucky it didn't happen tonight. ..show up at my joint again and see what happens ... I can't even believe it...ok...alright...Enjoy yourself on Thompson lane...

i. Sebastian Bach-background stated "Oh Sh^t!"

j. Defendant Rich stated, "On Thompson lane right off of I-24...

k. Sebastian Bach---background stated: "I know where that is... "

l. Defendant Rich offered, "I know where it is too.

m. Sebastian Bach---background, stated, "Lets go over there dude ... F\*@kin Moron!"

n. Defendant Rich stated, "Hey...you wanna show up and threaten me in my own bar...

I felt threatened by you tonight...you threatened me tonight...when my own...

o. Sebastian Bach---background stated, "He's such a f\*@king p^\*sy!"

p. Defendant Rich asserted, "my own place...I felt very threatened...and I did not like

it at all. ..and uhh.. I suggest you don't do it again...If you wanna square off man to

man...

q. Sebastian Bach---background stated, "Let's go...let's go over... "

r. Defendant Rich stated, "We got judges..we can go get right before a jury and let

them figure it out. .. ok ... have yourself a good night. .. "

s. Sebastian Bach---background offered, "Suck my c@ck!"

t. Defendant Rich stated, "Pay your taxes..." and then hung up. (See Exhibit 9; Aff.

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94. In the voicemail, Mr. Rich states that he "hopes that Jared will play this in Court."

95. Mr. Rich falsely accused Jared of breaking into his house, which was classic misdirection.

Mr. Rich later falsely accused me of "stalking" as part of the same kind of dirty legal tactic.

96. Mr. Rich has on more than one occasion falsely accused his opponent of a crime to further his agenda.

97. Mr. Rich thinks that he is smarter than everyone else and that no one would think that he would falsely accuse someone of a crime. Mr. Rich sincerely believes that he can get away with

this and the media, police, district attorney's office, and courts so far has allowed it to happen.

98. Mr. Rich indicated that he was immune to liability in Court by stating: " let's put this in court...we can play this back right in the middle of everybody."

99. Then to accentuate his belief that his superiority makes him above the law Mr. Rich declared "brother...I'm gonna knock the sh\*t outta you!"

100. Mr. Rich employed one of his favorite tactics with Mr. Ashley, like he later does with me by falsely stating "I felt very threatened."

101. Mr. Rich did not feel threatened by Mr. Ashley any more than he did by my offers to settle the cases in the Spring of 2013, which he used as a basis to accuse me of stalking.

102. Like the boy who cried wolf, I could not subsequently believe that Mr. Rich felt threatened by my offers to resolve the conflict, any more than anyone with common sense could believed that Mr. Rich felt threatened by Mr. Ashley on the night of March 9, when he punched Mr. Ashley in the face and then called him to intimidate him into not reporting.

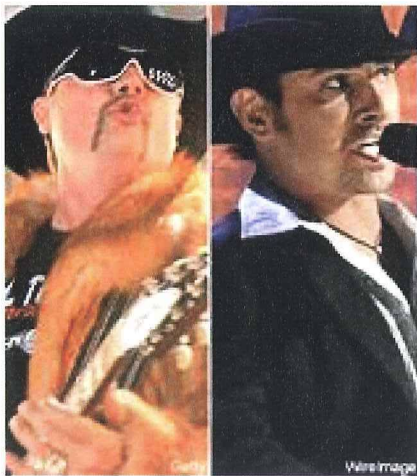
102. Mr. Rich said that he felt threatened as part of a dishonest tactic to further his agenda.

104. Then, Mr. Rich and Sebastian Bach threatened to go to Jared's house to attack him further and went so far as to identify Mr. Ashley's address to show Mr. Ashley that he knew where Mr. Ashley lived.

105. On the afternoon of March 13, 2009, Mr. Ashley filed a police report with Metro for assault at Legend's Corner, assault at the Spot, and for the telephonic harassment. Detective Anderson was assigned to the case. Detective Anderson interview Mr. Rich's body guard, 69, who admitted on two separate occasions that he had in fact observed Mr. Rich attack Mr. Ashley.



## 106. LAWSUIT NUMBER TWO:



Three warrants were issued for Mr. Rich's arrest. The State v. Mr. Rich was lawsuit number 2.

107. I had nothing to do with Mr. Rich's fights with Mr. Ashley. Mr. Rich was responsible for that conflict. Mr. Ashley reported Mr. Rich to the police acting on his own.

108. I did hear about the fight, and I contact Mr. Ashley to find out about it because I was concerned for the safety of my artists. Because we at Severe Records wanted to strengthen our restraining order request against Mr. Rich in Federal Court and because I wanted to protect Mr. Ashley from Mr. Rich coming to his house and attacking him, I signed Mr. Ashley to my record company so that his testimony would be relevant in that case. This was a legitimate lawyering tactic that offend Mr. Rich to the core because him and Mrs. McKenzie believe that their self-entitlement makes it impossible for them to be "outsmarted," which is the kind of irrational thinking that makes them dangerous to our communities.

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109. On March 30, 2009, a radio station called Jared Ashley to ask him about the fight at the Spot between Mr. Rich. The radio station had acquired Mr. Ashley's affidavit that I had filed in Federal Court in support of my restraining order against Mr. Rich.



110. Ever since, I filed the restraining order against Mr. Rich, he resolved to get back at me by taking out a restraining order against myself.

111. LAWSUIT NUMBER THREE:

In response to the call from the radio station, Cyndi McKenzie filed a frivolous defamation case, lawsuit 3, on Mr. Rich's behalf against Jared Ashley in civil court. Mrs. McKenzie and Mr. Rich knew that Mr. Ashley did not have the resources to defend himself. Mr. Rich and Mrs. McKenzie intended to use their civil lawsuit as leverage in Mr. Ashley's criminal one.

112. LAWSUIT NUMBER FOUR: I agreed to defend Mr. Ashley in Mr. Rich's lawsuit 3 against him. I also agreed to file a new civil case, lawsuit 4, against Mr. Rich on Mr. Ashley's behalf for assault and defamation - Mr. Rich was falsely accusing Mr. Ashley of breaking into his house.

113. On May 22, 2009, Mrs. McKenzie and Mr. Rich sent Marc Oswald to Mr. Ashley's house to bribe him into dropping the criminal assault charges. They wanted to pay him \$25,000, which was the same amount they had paid Mr. Montano. Neither I nor Mr. Ashley invited Mr. Oswald over. Mrs. McKenzie, Mr. Oswald and Mr. Rich intended to either (1) pay off Mr. Ashley or (2) set a trap to frame him and myself for extortion in the media. (This is the exact same kind of abuse of settlement and framing that has occurred in this case regarding myself and the false stalking charge). Once at the meeting, Mr. Ashley surreptitiously tape recorded Mr. Oswald because none of these individuals can be trusted. Mr. Rich, Mr. Oswald, and Mrs. McKenzie believe that their positions, money, and influence make them smarter and superior to everyone else naturally.

*Be sober-minded; be watchful. Your adversary the devil prowls around like a roaring lion, seeking someone to devour. 1 Peter 5:8*

114. At the meeting, Mr. Oswald admitted on tape that Mrs. McKenzie, Bill Ramsey, and Mr. Rich had sent him over to secretly pay off Mr. Ashley to drop the criminal charges. Mr. Oswald put himself, Mr. Rich, Mrs. McKenzie, and Mr. Ramsey on the hook for attempted bribery. They were trying to cover up Mr. Rich's prior crime by committing new ones, under their win at all cost mentality. Mr. Ashley rejected their offer, saying that the criminal case was not about money. The case was about getting Mr. Rich to leave him alone.

115. I then showed up to the meeting to try and figure out what these scoundrels were trying to pull, and the subject changed to the civil matters, since I was Mr. Ashley's civil attorney in civil lawsuits 3 and 4.

116. Civil Settlement negotiations failed. Mr. Ashley was not interested in settling. Mr. Ashley did not want the cases resolved until he filed a civil lawsuit of his own against Mr. Rich.

*"Whoever digs a pit will fall into it; if someone rolls a stone, it will roll back on them." Proverbs*

*26:27*

117. FIRST ATTEMPT TO HAVE ME FALSELY ARRESTED: On May 27, 2009, Mrs. McKenzie falsely reported Mr. Ashley and myself to the District Attorney's office for the crime of extortion, surrounding the meetings with Mr. Oswald.

118. Mrs. McKenzie called ADA Rosemary Sexton and made a false report, stating that Mr.

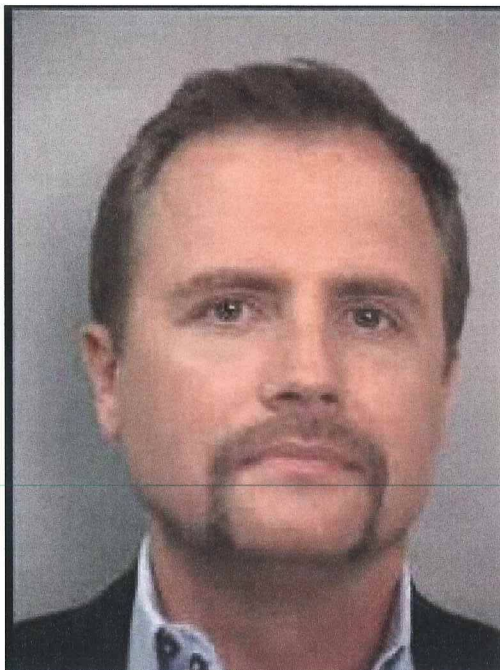
Ashley and I had sought out Mr. Oswald and demanded that Mr. Rich pay 2.9 million dollars to drop the criminal charges. She was unaware that we had surreptitiously taped those conversations, which proved that she was overtly lying. At every turn, Mrs. McKenzie has set out to have myself arrested as a form of "payback" in fulfilling her contract to Mr. Rich to do anything she can get away with to hurt me. Mrs. McKenzie is much older than me so she feels like she has the right to beat me in Court on that basis alone, in total disregard of the importance of the rule of law. In response to Mrs. McKenzie's false report, ADA Sexton called Jared Ashley to question him as to whether he or I made an offer to drop the criminal charges in meeting with Marc Oswald. We denied the false allegations lodged by Mrs. McKenzie, and no charges were filed by the District Attorney's office at that time.

119. Mrs. McKenzie falsely accused us of a crime to justify the huge legal fees that she was billing Mr. Rich under. These kinds of practices were part of her business strategy at the kind of thing that makes her a danger to society.

120. By sending Mr. Oswald to Mr. Ashley's house and by making the false report to the District Attorney's office, Mrs. McKenzie engaged in attorney misconduct that should cause her to be disciplined by the Board of Professional Responsibility, since she was acting outside the scope of normal lawyering to gain advantage in civil litigation.

121. SECOND MAJOR DEFAMATION IN THE MEDIA: On May 28, 2009, Mr. Rich was arrested for the three crimes that Detective Anderson had investigated. The arrest was national news. After the arrest, Mr. Rich and Mrs. McKenzie concocted a damage control plan to explain away the charges to the public that amounted to libel per se.





*(John Rich's mug shot)*

122. On the day of the arrest, Mr. Rich and Mrs. McKenzie went to the media and falsely stated:

*NASHVILLE, Tenn. - Country music artist John Rich, of the duo Big & Rich, will face misdemeanor assault and harassment charges, according to Metro Police. The charges were filed by former "Nashville Star" contestant Jared Ashley and stem from two separate alleged incidents at two downtown Nashville bars.*

*Affidavits said that in June 2008, Ashley was performing on the stage of the Legends Corner bar at 428 Broadway. Rich allegedly walked onto the stage, put his arm around Ashley and whispered threats of bodily harm into Ashley's ear. Rich then reportedly squeezed Ashley's neck and jerked it several times.*

*Rich was reportedly asked to leave the stage after the incident.*

*Affidavits summarized a second alleged incident in March 2009. Ashley and Rich reportedly began arguing at The Spot bar at 411 Broadway. Rich allegedly struck Ashley in the jaw with his fist.*

*Rich reportedly refused a request to settle out of court with Ashley for \$2.9 million.*



Rich will face two misdemeanor counts of assault and two misdemeanor counts of harassment, according to investigators.

Rich released a statement that said:

"The entire ridiculous situation is nothing more than an effort by singer Jared Ashley and Music Row attorney Chris Sevier to try to obtain money from me. Mr. Sevier and Mr. Ashley have falsely accused me of misdemeanor crimes. I trust that the truth will come out through the process of our American justice system and that I will be completely exonerated at the end of the day."

Rich's attorney, Cynthia S. Parson released a statement Friday that Rich said clarifies the first statement:

"I would like to further clarify my original statement released last night. Singer Jared Ashley and music row attorney Chris Sevier demanded I pay 2.9 million dollars in exchange for dropping false misdemeanor charges that they levied against me. They filed the misdemeanor charges in retaliation to the civil suit regarding defamation that I filed against Jared Ashley. I refused to pay the \$2.9 million and instead opted to turn myself in and fight this in court."

Rich is free on a \$3,000 bond.

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123. Mr. Rich and Mrs. McKenzie acted together in releasing this false statement to the press.

This was not the first or last time these two would falsely accuse me of a crime in the media.

124. Mrs. Mckenzie and Mr. Rich new that the statements were false but they set out to use the media to discredit Mr. Ashley and myself because they believe that they are above the law.

125. These statements were reasonably calculated to place us in a false light. The statements accused me of a crime while acting in my capacity as an attorney.

126. The statements were crafted to cause people in our community to shun and avoid us and to place us in a bad light so that we would be harmed.

127. KRISANN HODGES AND NANCY JONES FROM THE ETHICS COMMISSION

## ENTER THE STORY:



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*(Nancy Jones)*

128. Under the rules of professional responsibility, whenever one lawyer sees another lawyer commit ethical misconduct, the observant lawyer has a duty to report the offending one to the Tennessee Board of Professional Responsibility (BPR). If the lawyer who witnessed the misconduct fails to report, that lawyer can be subjected to disciplinary sanctions themselves. This rule is designed to preserve the integrity of the bar. The problem here was that although the rules of the BPR, like that one are just, the people who enforced the rules were corrupt.

129. On June 2, 2009, I met with the BPR about lodging a complaint against Mrs. McKenzie and Mr. Ramsey for making false statements in the media, (which violated BPR rule 3.6). My proof was that I had the tapes from the meetings with Mr. Oswald, which demonstrated that Mrs. McKenzie and Mr. Rich had lied to the media, as part of an elaborate plot. Not only did Nancy Jones at the BPR overtly ignore the complaint against Bill Ramsey and Mrs. McKenzie, she turn on me and started relentless harassing me by covering me up with frivolous ethics inquiries. Her ruthless side kick, Krisann Hodges, also joined her in oppressing me for doing my job to report misconduct. It was a display of magnified evil that would cause any normal lawyer to want to

resign from the Nashville Bar in protest of the stark hypocrisy. (The abuse of the ethics commission was no different than the abuse demonstrated by the IRS this past spring, who targeted conservative groups because of diverging values).

130. Mrs. Jones and Mrs. Hodges started mismanaging their powers at the BPR because I was a younger attorney, who was reporting older ones of ethical misconduct, who they were friends with. These people protect one another as part of some backwards "Good Ole Boy Network," that makes Tennessee come across as worthy of contempt. At the time these events were transpiring, Mrs. Jones was planning on running for a slot on the court of appeals, so she needed the support of Mr. Ramsey's firm Neal & Harwell more so than she needed the support of an shingle attorney, who could only offer idealism, and not support for her judicial ambitions.

Because Mrs. Jones and Mrs. Hodges attacked me relentlessly for reporting Mr. Ramsey, I publicly made known how they were abusing their offices so that the legal community would view them with the contempt that they deserve.

131. *Proverbs 17:15 "Acquitting the guilty and condemning the innocent-- the LORD detests them both."* Meanwhile, I am was new lawyer who experienced extreme emotion distress over being falsely accused of ethical misconduct on top of having been defamed by Mrs. McKenzie and Mr. Rich. The justice system was supposed to be working one way in Tennessee according to the law, when it was actually working another, according to relationships. Relationships are all that matter, the law takes a back seat to "politics," which gives the appearance that justice through the Courts is a scam. Nancy Jones and Krisann Hodges had reduced the BRP into an instrument of politics and of selective application of the rules of professional responsibility,



which offended everything I believe the law to be about - namely the black and white application of the law to the evidence and facts.

132. *Exodus 23:2 "You shall not fall in with the many to do evil, nor shall you bear witness in a lawsuit, siding with the many, so as to pervert justice."* Ultimately, Nancy Jones was forced to recuse her from my case, following a publication by the Nashville Bar Journal which accused her of being overly prosecutorial, and connected her to Bill Ramsey. The connection between those two confirmed my allegations that she was oppressing me because of her personal relationship with Mr. Ramsey. Mrs. Hodges, who is equally as void of character as Mrs. Jones, replaced Mrs. Jones and continued the meritless quest to hurt me for public exposure of mismanagement I had inflicted.

133. *"Whoever walks in integrity walks securely, but he who makes his ways crooked will be found out." Proverbs 10:9.* Additionally, on June 2, 2009, I met with then District Attorney Anton Jackson, under the guidance of metro police department, to provide him with evidence that Mrs. McKenzie, Mr. Rich, Mr. Ramsey, and Marc Oswald engaged in attempted bribery on May 22, 2009, conspiracy to facilitate the unauthorized practice of law, and obstruction of justice. The evidence was the tape recordings, which spoke for themselves and proved the case on their own.

134. Having been trained as a prosecutor by the United States Military, I can attest that the tapes were more than sufficient evidence to have had all of the suspects charged with intimidation of a witness, obstruction of justice, and attempted bribery. These individuals were collectively



attempting to cover up an assault by committing new crimes, which is a factor in aggravation that warranted prosecution.

135. Mr. Jackson admitted in the meeting that he was friends with Mrs. McKenzie. Instead of doing his job, Mr. Jackson ultimately lied on behalf of Mrs. McKenzie involving the development of the investigation to save her neck before the BPR and refused to prosecute any of them despite the evidence because of his personal relationship with the suspects.

136. BLATANT DISTRICT ATTORNEY CORRUPTION: Then to make matters worse in compounding corruption, Mr. Jackson quit the District Attorney's office, joined Mrs. McKenzie's law firm, as her only other partner, and had the nerve to appears in subsequent civil cases against myself on behalf of Mr. Rich. That is, Mrs. Jackson not only failed to prosecute Mr. Rich for the crimes assigned to him that I reported, he actually quit the DA's office and became one of Mr. Rich's paid attorneys and has appeared to represent him in a case that materialized later against myself. This was all carried out as part of quid pro quo contract. These developments warrant investigation by the media and the department of justice and should not be tolerated by civilized society. Mr. Jackson proves the dire need for more accountability to be imposed on prosecutors.



137. Mr. Jackson's actions were disgraceful and impeach the integrity of the District Attorney's office.

138. On August 27, 2009, Judge Haynes abused his discretion by dismissing my June 2008 Copyright Lawsuit, lawsuit number 1, dismissing the federal claims with prejudice and the state

law claims without prejudice (which means that I had the legal right to refile the state claims in state court). Judge Haynes never ruled on my decision to issue a restraining order against Mr. Rich, as he was required to under the Federal Rules of Civil Procedure.

139. In September 2009, I split lawsuit one in half. I appeal the federal claim to the 6th Circuit Court of Appeals. I did not appeal the first major act of defamation claims that took place through Mr. Rich and Mrs. Crooks on Myspace on July 7, 2007. I subsequently refiled the those defamation claims with new ones in lawsuit 5.

140. In September 2009, I withdraw as Mr. Ashley's civil attorney because I was notified that I was being called up by my infantry unit to deploy to Operation Iraqi Freedom on December 5, 2009.

141. LAW SUIT TWO: On November 20, 2009, Mr. Rich was tried for three crimes committed against Mr. Ashley. Assistant District Attorney Welch intentionally threw the case against Mr. Rich, refusing to call Detective Anderson to the stand. The entire case was built around Detective Anderson's investigation, which proved Mr. Rich had assaulted Mr. Ashley. But ADA Welch never called Detective Anderson to testify. ADA Welch was mad at me for reporting Mr. Jackson to the BPR for misrepresenting the truth to protect Mrs. McKenzie, the lawyer who he left the District Attorney's office to partner with. Both the state and Mr. Rich tried to make the lawsuit all about me, but Judge Holt would not allow it. (A huge problem with the district attorney's office is that District Attorneys have too much power without enough accountability and this makes a lot of them corrupt).

IRAQ: OPERATION IRAQI FREEDOM AND THE REPRISAL OF CONGRESSMAN

WINDLE:



*Congressman Windle above*

On December 5, 2009, I deployed to Operation Iraqi Freedom with a great combat Unit - the 278th Armored Calvary Unit. I was attached with Cobra Squadron and Regimental Fire Support in Norther Iraq. I was an 02, First Lieutenant, who was operating in an 06, Full Bird Colonel slot, covering down on two bases, participating in the rule of law mission, the rules of engagement, and prosecutions with 3rd ID in Northern Iraq. I went outside the wire regularly and was in combat against Al Qeda. A conflict arose between myself and my opposing counsel, Congressman and Lieutenant Colonel John Mark Windle, that carried over outside of judicial



settings. At the time, Congressman Windle was violating all kinds of rules and abusing his powers. I promised to report the Congressman to the Inspector General if he did not revoke certain illegal orders that were prejudicial to my clients, the commanders of the squadrons that I was attached to. I made this legal threat while acting in the scope and line of my duties as a Judge Advocate. To prevent me from reporting, Congressman Windle conspired with Major Lewis, a psychiatrist, at combat stress to impose a plan to silence and discredit me. Major Lewis issued a phony diagnosis against me to have me detained and sent out of Iraq; they tried to make me out as being "crazy," when I was merely doing my job as a Judge Advocate. I was effectively tortured through that experience, as I was held against my will and severely mistreated. Almost begin killed by Al Qeda was one thing, but to be attacked by Soldiers on your own side was incomprehensible under the conditions. It was an in comprehensible atrocity of unbearable unconscionability. For a Judge Advocate to be punished for enforcing the law is the worst kind of reprisal because that is his job. If Judge Advocates are not permitted to whistle blow, then which kind of Soldier can? I was sent home through the wounded warrior program from Iraq shattered by that experience. My opponents back in Tennessee at the BPR, Mrs. Mckenzie, Mr. Rich, and others would aggressively capitalize on that experience to greatly prejudice my interest, and in doing so committing service discrediting misconduct that dishonors the military itself.



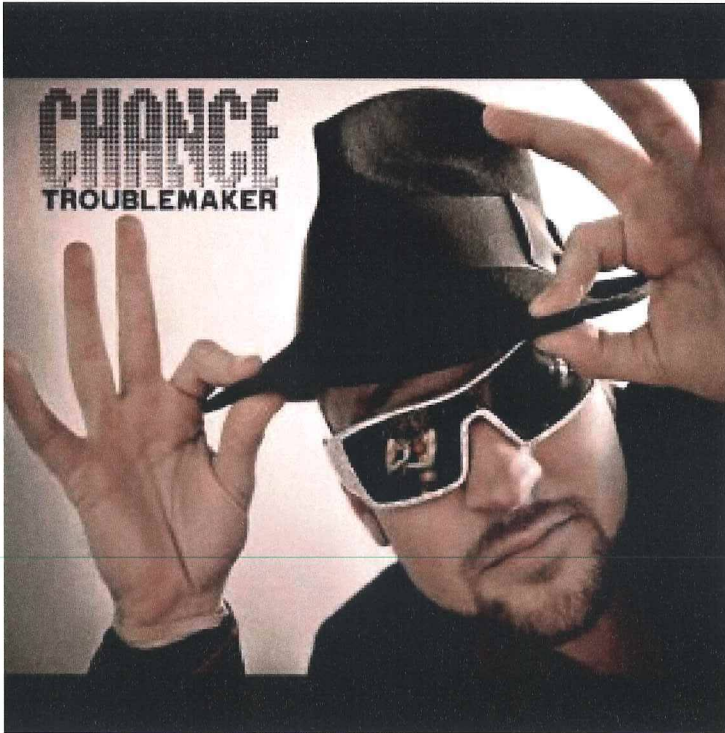
142. LAWSUIT FIVE: In May 28, 2010, I file refiled the defamation claims on myspace that were severed from the copyright action (lawsuit one). I also included defamation claims for the false statements that Mr. Rich and Mrs. McKenzie made to the media on May 29, 2009, Mr. Ashley and I of extortion. I not only sued John Rich, I also named Mr. Oswald, Mrs. McKenzie, and Mrs. McKenzie's law firm, Neal & Harwell to the lawsuit as well. (Just like Mr. O'Reilly, Neal & Harwell was not above the law). Judge McClendon was assigned the case but recused herself "sua sponte" for being biased because I had added Neal & Harwell as a defendant.

143. Special Masters Marsh Nichols brought the Honorable Senior Judge Harris from Williamson County to replace the Nashville Judge, Judge McClendon.

144. This was the first lawsuit that Mr. Rich and Mrs. McKenzie were codefendants in. Mrs. McKenzie should have been prevented/estopped from representing Mr. Rich in all cases until the matter was resolved, but because the BPR, who enforces such rules, was mad at me for accusing them publicly of mismanagement, Mrs. Hodges did not enforce this rule against Mrs. McKenzie, who was acting with as an attorney in litigation with a personal interest at stake.

(Lady Justice in Nashville is not "blind," she is "politic" and that is why the Courts should not be trusted.)

145. THE EMPIRE STRIKES BACK: LAWSUIT SIX AND LAWSUIT SEVEN:



146. Mr. Rich's favorite thing to do is to destroy another artists career. It gives him a real sense of power and purpose more so than other positive accomplishments. When Mr. Rich has a grudge, he cannot let it go. Ever since Chance filed the affidavit against Mr. Rich that was used in Lawsuit 1, Mr. Rich was dead set on getting "pack back.. So, in September 2010, Mr. Rich began trying to provoke fights with Chance in keeping with his modus operandi to reel people in and then accuse them of being threatening.

147. In September 2013, the recording artist known as Chance, who used to be signed with Mr. Rich, was in talks with Show Dog records about working together.

148. Mr. Rich told Big Vinny, who was a member of the Tennessee Trailer Choir, who was signed to Show Dog Records, that if anyone at Show Dog Records was to work with Chance, Mr. Rich would destroy their career. Big Vinny reported that news to Chance, who was upset with Mr. Rich's interference of his prospective business relationships.

149. In response, Chance produced a song that painted Mr. Rich as a calculating scoundrel. The



video was released on youtube.

150. Mr. Rich had Mrs. McKenzie file a frivolous order of protection lawsuit against Chance, in which Mr. Rich falsely alleged that the music video constituted a "death threat." (Lawsuit 6).

151. I appeared as the attorney of record on behalf of Chance to defend him.

152. The case went before Judge Robinson, which I expected Judge Robinson to call a "spade a spade" and to immediately dismiss the action, but he did not. A week before the hearing, I was called away by my unit on a special mission with Cobra squadron, and at the last second, a public defender was brought in to represent Chance out of necessity. Judge Robinson incredibly allowed John Rich to have an order of protection taken against Chance, which I found to be suspicious and unfair. There appeared to be a political taint over that decision.

152. I appealed the case to Circuit Court on Chance's behalf. The case went before Judge Solomon. Mrs. McKenzie filed a motion to disqualify me under rule 3.7 and 1.7. Judge Solomon granted the motion. Meanwhile, Mrs. McKenzie's representation of Mr. Rich violated those same rules to a much greater degree than my representation of Chance did. But agenda, not the law has at all times been controlling. My disqualification left no one to defend Chance against Mr. Rich and Mrs. McKenzie. And an order of protection was wrongfully entered against Chance, further discrediting the justice system, as a place where the rich can purchase justice. Additionally, Chance was ordered to pay Mr. Rich \$30,000. These undeserved and unjust victories only further reinforce Mr. Rich's self-entitlement syndrome which ultimately created this lawsuit, but worse, they paint the Nashville Justice system as a scam that should be avoided at all cost and viewed with suspicion and public scrutiny.

153. LAWSUIT SEVEN BASED ON LAWSUIT TWO: On November 19, 2010, Mrs.

McKenzie and Mr. Rich filed a frivolous lawsuit against me for malicious prosecution and abuse of process. The claims in that lawsuit were completely void of merit. Mr. Rich and Mrs. McKenzie were aware of that but hoped that if they could convince the Judiciary to dislike me they could win on that basis alone, since it was apparently working for them in other venues. Mr. Rich and Mrs. McKenzie alleged that I was the one that had Mr. Rich arrested through Jared Ashley for the events that took place on March 13, 2009, which was the single event that caused Mr. Rich's solo record to flop. In order for someone to sue someone for malicious prosecution, they have to (1) have a victory in the prior case and (2) the prior criminal charges must have lacked probable cause. In terms of the first prong, Mr. Rich did not have a complete victory in the criminal assault case involving Mr. Ashley. Mr. Rich had procedural victories on at least one of the assault charges in the prior case, which meant that his guilt or innocence remained questionable, which barred a malicious prosecution action. Additionally, Mr. Rich obtained that acquittal through fraud. ADA Welch threw the case by not calling Detective Anderson to the stand, and ADA Jackson quit the DAs office and started working for Mr. Rich in lawsuit 7 against me as part of a cross-collateralized plan of "back scratching." In terms of the second prong, there were mountains of evidence that Mr. Rich was guilty of the three crimes he was charged with and that he should have been convicted and put in jail. Such evidence barred a case for malicious prosecution because, unlike in the cases against me for "stalking" there was probable cause to support the charges. The evidence that supported probable cause for Mr. Rich's arrest included (1) the 6am voicemail left by Mr. Rich and Mr. Bach, (2) the eye witness account of Danny Basham, (3) Jared Ashley's testimony, (4) the pictures and video of the assault at Legend's Corner, (5) Mr. Rich's past history of violence against Jerry Montano that was in

superior Court in California, (6) Robert Smith's testimony, and (7) Detective Anderson's investigation findings, which were that 69 had admitted in two separate interviews that Mr. Rich punched Mr. Ashley. Nevertheless, Mr. Rich's lawsuit against me for malicious prosecution was the actual malicious prosecution.

154. Lawsuit 7 was Mrs. McKenzie and Mr. Rich's response to my libel lawsuit filed against them a few months prior. The entire reason behind their filing of lawsuit 7 was to set a stage to subsequently accuse me of stalking. Mr. Rich was trying to draw me into further conflict, as he had done with Chance in lawsuit 6. Mr. Rich filed lawsuit 7 against me to show prospective partners that criminal charges were maliciously filed against him and that he was a victim. This was the same rational that caused him to falsely accuse me of stalking to secure contracts with T.V. Guide, CBS Corp, and Lions Gate, as the Court began to clue into the fact that Mr. Rich's lawsuit 7 was frivolous, as time went on. Mr. Rich believed that to discredit me and not let the truth get out because he is beyond paranoid. He believes that everyone is out to get him, which is result of a guilty consciences. In filing lawsuit 7, Mrs. McKenzie demonstrated that she and Mr. Rich believe that the best defense is an offense, just like in lawsuit 3, when she sued Mr. Ashley for defamation on Mr. Rich's behalf, after Mr. Ashley reported Mr. Rich for criminal assault. Mrs. McKenzie appeared on behalf of Mr. Rich in lawsuit 7, which was a blatant ethical violation because she was codefendant with Mr. Rich at the time in lawsuit 5. But Mrs. Hodges did not care. Mrs. McKenzie's appearance on behalf of Mr. Rich raised a conflict of interest presented under rule 1.7 and because Mrs. McKenzie was a foreseeable witness in lawsuit 7, she should have been disqualified for the same reasons that I had been before Judge Solomon in lawsuit 6 in representing Chance. But that the disqualification of Mr. McKenzie never happened



in her representation of Mr. Rich because the law is not at work in Tennessee Court's - politics is. All of the defendants named here should understand that if Krisann Hodges had done her job and prevented Mrs. McKenzie from representing Mr. Rich in lawsuit 7, then this lawsuit would never come about. So, the defendants here can give Mrs. Hodges a round of applause for that. If the Tennessee Court's had required Mrs. McKenzie's disqualification for the same reason that I was disqualified for representing Chance, this lawsuit would not exist. Both the BPR and several Tennessee Court's have acted dishonorably in this capacity.

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155. LAWSUIT FIVE DISMISSED AND NONSUITED: In May 2011, the Honorable Judge Harris awarded partial summary judgment in my defamation lawsuit against Mr. Rich and Mrs. McKenzie in their favor. The decision was based on a hyper technical error under rule 4 that related to the summons forms and my failure to get the clerk to sign the form. I elected to nonsuit the surviving claims out of mercy. I am not an angry litigious person that Mr. Rich and Mrs. McKenzie are. Mr. Rich and Mrs. McKenzie were not tried on the merits and got away with committing the first two major acts of defamation along with other torts that were damaging to me.

16. Judge Harris, who is kind and gracious, cut Mrs. McKenzie and Mr. Rich a huge break out of an abundance of good faith and mercy. I did not have a problem with that, but that act of mercy did not decrease Mr. Rich and Mrs. McKenzie's resolve to hurt me because Mr. Rich cannot let things go. Mr. Rich is the kind of guy that if you give him a break, he will use that against you.

156. LAWSUIT NUMBER EIGHT: In May 2011, I filed a lawsuit against Mrs. McKenzie, Mr. Rich, Nancy Jones, Krisann Hodges, ADA Welch, ADA Jackson, ADA Sexton, and Mr. Oswald for their concerted effort of mismanagement and abuse that was not protected by law and was

designed to help further Mr. Rich's agenda. That is, I complained that Mrs. Hodge's was interfering with civil litigation in her misuse of the BPR for Mr. Rich's benefit. The lawsuit was grounded on Constitutional considerations. I was alleging that state officials had misused their authority to interfere with valid civil litigation. I asserted that the case arose under 42 USC 1983, violating freedom of speech, the petition clause, and the due process clause. Mrs. Hodges and Mrs. Jones should have waited until after the civil litigation between Mr. Rich and myself was resolved to evaluate where there was an ethical violation, since I was a personal party involved in a case. The fact that I sued three Assistant District Attorneys caused the police and District Attorney's office to have bad blood towards me. I named the District Attorneys in the case because I believe that officers of the Court have a duty to keep other officers of the Court honest, in compliance with the rules. Because the BPR was not doing its job, I felt that naming the Assistant District Attorney's in a lawsuit would establish a trail of corruption that could be pointed back to if such abuse were to continue.

157. LAWSUIT NUMBER ONE: In the June of 2011, Mrs. McKenzie and I argued the Copyright case before the 6th Circuit Court of Appeals. The Court found in my favor that Judge Haynes had abused his discretion, remanding the case back to Judge Haynes. The 6th Circuit also made it clear that Mr. Rich was liable for the grounds for which he was sued. Mr. Rich and Mrs. McKenzie continuously attempted to portray that action as a copyright one, when it never was because manipulation is a way of life for them. Because I had basically discovered that trying to accomplish Justice through the Courts in Tennessee was designed to be frustrating for any reasonable person, I decided to nonsuit the claims against Mr. Rich and Mrs. Crooks following the remand. Additionally, I would like anyone in the public who reads this to know that being

right is not what it is cracked up to be. People who spend their lives focused on Court battles are miserable creatures. Litigation turns otherwise normal people into angry persons. (My lawsuits against Mr. Rich have all been slammed dunk cases, but its never really mattered.) The power of anger, even if it is justifiable anger, is that it is indiscriminate as to who receives the bad end of it. That is why, as a lawyer, I can attest that it is better to pursue peace whenever the opportunity presents itself, even if that means sometimes giving up your rights or even allowing yourself to be mistreated. Life is full of some many better things than the side tracking affair that litigation presents. The promise of the Courts is elusive, which is a position I can confirm after five years of litigation. The Tennessee Court's really left me out to dry in these affairs.

158. In September 2011, the VA found me to be suffering from combat related post traumatic stress disorder. I had been through some experiences in combat that were traumatic. That injury was compounded by how individuals were able to misuse the Courts to antagonize me for being a whistle blower. As anyone who is reading this can, I've been through some pretty challenging circumstances and had to deal with more unfairness than the typical person was designed to deal with.

159. LAWSUIT NINE DISCRIMINATION AGAINST A WOUNDED WARRIOR: Around September/August, Krisann Hodges petitioned the Tennessee Supreme Court to have my law license deactivated for medical reasons because I told her that the VA had found that I had PTSD from Iraq. Such as discriminatory practice came from the source of dark heartedness that marks her nonexistent character. The fact that she holds the title of an ethics commissioner but then would attempt to use a war injury for her personal advantage is classic misdirection. I responded in opposition, asserting that just because I had admitted to having PTSD, did not mean I could



not practice law. I argued that Krisann Hodges was retaliating against me maliciously for filing lawsuit 8 against her personally, as would have been obvious to anyone with common sense, given the glaring conflict of interest. The Tennessee Supreme Court denied her motion the first time. A hearing for the frivolous ethical charges against me was set for December 2011, which I welcome because it created the opportunity for me to be vindicated. Two weeks before the hearing I email Krisann Hodges pointing out that she had no evidence to convict me at the ethical hearing and the only result of the hearing would be that lawsuit 8 against her and Mrs.

Jones would be strengthened. In response, she panicked and confiscated my confidential medical war records from the VA in violation of HIPPA. Mrs. Hodges filed them publicly before the Tennessee Supreme Court seeking to deactivate my Tennessee law license for matters that had a direct connection to military affairs. Mrs. Hodges failed to provide a single example of how my combat related PTSD was having any adverse impact on my clients. She was unable to provide any evidence to that end because the BPR is a fraud mill. Even now as you read this sentence, I am practice law, which just shows that officials at the BPR, like Mrs. Hodges are sell outs, who ultimately create more problems then they solve by being dishonest. The Tennessee Supreme Court should have never considered the matter the first or second time because the BPR is an agent of the Tennessee Supreme Court. Because lawsuit 8 against two BPR's agent was pending at the time of the petitions, the Tennessee Supreme Court should have not considered the matter due to insurmountable conflict. I trusted that surely the Tennessee Supreme Court was above politics and would not allow me to be hurt because I served my country during a time of war. As an idealistic lawyer, it was essential to be able to believe that the Tennessee Supreme Court was an institution of honor. But the at the end of day, "the ends justify the means" dogma

proved to be superior than the rule of law, even before the Tennessee Supreme Court.

Unbelievably the Tennessee Supreme Court forced medically deactivated my law license due to "mental illness," which is knew or should have known would be used by my opponents in civil litigation, since Mrs. Hodges was named with Mr. Rich in a federal lawsuit at the time. In making this decision, the Tennessee Supreme Court demonstrated dishonor towards lawyers, the United States Military, and wounded warriors. In response, John Rich and Mrs. McKenzie took credit for all of that injustice, and considered it a form of payback. Anyone with common sense knows that the stigma of "mental illness" is broad and could mean anything. Mrs. McKenzie and Mr. Rich were well aware of that and used this ambiguity to their advantage as they subsequently worked to smear me in the media. Just like falsely reporting someone of the crime of stalking is a convenient way to punish them, falsely labeling someone as being "mentally ill" is a convenient way of discrediting them. All of these things demonstrate a need for additional checks and balance over those in the judiciary.

160. I have never disputed that I have PTSD, which symptoms manifest themselves as numbness, exaggerated startle response, avoidance, and night terrors. Such symptoms do not preclude one from practicing law any more so than the symptoms of those who suffered from ADHD. Accordingly, the Tennessee Supreme Court knowingly ratified discrimination against a wounded combat veteran through a plot hatched by Mrs. McKenzie, Mr. Jackson, Mr. Rich, and Mrs. Hodges working in concert in their effort to get "payback." The Tennessee Supreme Court got some payback of their own for my lawsuit against their agent, Mrs. Hodges. None of these activities should be tolerated by civilized society and the Tennessee legislature should consider the take aways from this action and be responsive for the sake of the citizens of Tennessee. The

BPR needs to be completely revamped and there should be more arms length between the BPR and the TNS.

161. SETTLEMENT DISCUSSIONS THAT LEAD TO THE PHONY STALKING

CHARGES: Around March 2012, I allowed Judge Campbell to dismiss my May 2011 complaint (lawsuit 8) against Mrs. McKenzie, Mr. Rich, Marc Oswald, ADA Welch, Mr. Jackson, and ADA Sexton without prejudice. The way that the case was dismissed gave me the option to refile the matter in state court under the savings statute. I considered doing that so that I could have, lawsuit 7, consolidated with lawsuit eight, since they arose from the same common nucleus of facts. Before refiling, I felt like I need to contact Mr. Rich about a way to resolve all the cases, because from the outset, it has always been my intent to be a peacemaker. Also, I had the right to Appeal lawsuit 1 to the 6th Circuit Court of Appeals a second time, which would have cost Mr. Rich a fortune. I elected to continue the settlement discussions with Mr. Rich to offer "you pull your lawsuit and I'll pull mine." It was not a very original offer, when it comes to litigation between Mr. Rich and his adversaries. I knew that, unlike myself, Mr. Rich had spent hundred of thousands of dollars in fighting me, and had only further confirmed that he has bad judgment to the public. At no time has there been any upside to litigation for Mr. Rich.

162. Normally, a lawyer cannot have direct communication with the opposing party in a lawsuit. There is an ethical rule for that rule 4.2. But because Mrs. Hodges had my law license temporarily deactivated, rule 4.2 did no longer applied to me personally. This permitted me to contact Mr. Rich directly. Plus there were no restrains that prohibited me from continuing a settlement conversations. There is no evidence that I've been a threat to anyone - besides to one's financial interest in civil court.

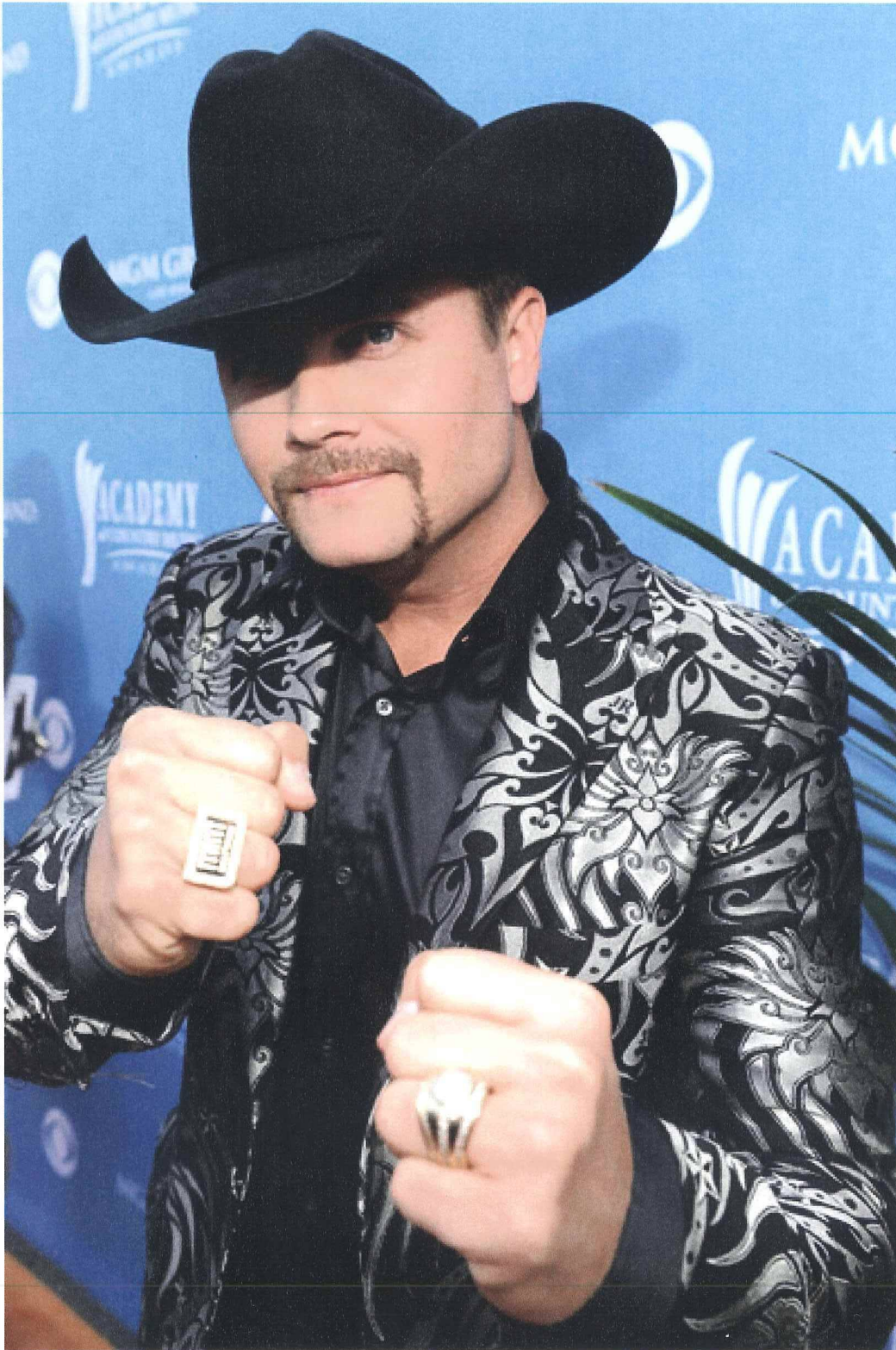


163. Additionally, I had four other reasons for wanting to resume settlement discussions with Mr. Rich directly, as opposed to dealing with Mrs. McKenzie. First, Mr. Rich started these discussions in October 2005, when he contacted me. I felt like I could legitimately continue those discussion, as any creditor has the right to contact a debtor to discuss ways to resolve their dispute. Second, Mrs. McKenzie was making a fortune off of the Mr. Rich's arrogance in these matters. Mrs. McKenzie lacked the incentive to tell Mr. Rich that he should have never tried to fight me in Court. Mrs. McKenzie is dishonest and greedy and cannot be trusted whatsoever. She has no honor core at all. Third, Mrs. McKenzie had falsely accused me of committing an offense in settlement discussions with her in the past, and there was nothing to stop her from doing that again.

164. Forth, most importantly, I felt like I needed to talk directly to John Rich because Mrs. McKenzie was a codefendant with Mr. Rich in lawsuit eight. (She had been a defendant with Mr. Rich in lawsuit 8). My offer was that I would not refile lawsuit 8 in state Court, if John Rich would pull lawsuit seven (his malicious production case). *(I wanted to get away from Mr. Rich. But Mr. Rich wanted to keep me around by keeping the litigation going because he felt like he had to discredit me.)* Because Mrs. McKenzie was continuing to represent Mr. Rich in lawsuit 7, despite the huge conflicts of interest, I felt like I could not talk about settlement with her because she was more than just John Rich's attorney. She was a party to the lawsuits. Mrs. McKenzie had a personal stake in the litigation. I can't emphasis enough that if Mrs. Hodges had done her job to made Mrs. McKenzie disqualify herself from representing Mr. Rich, none of the events that followed would have occurred.

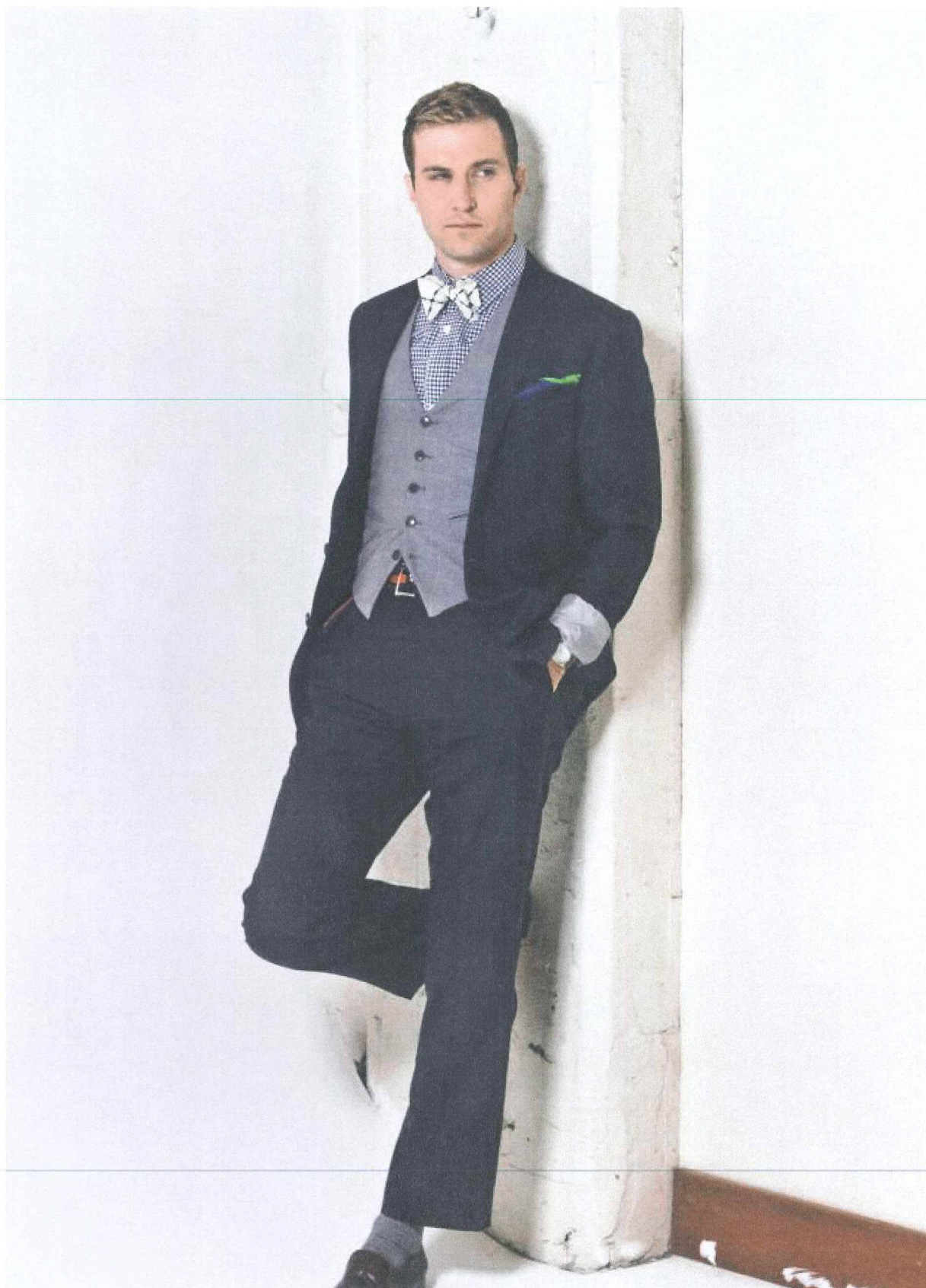
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***PEACE TALKS AND THE STALKING SCHEME BEGIN = CONVERSATIONS IN THE  
SPRING OF 2012***



*Fist Out v. Fist in pockets*









165. *"Blessed are the peacemakers, for they shall be called sons of God." Matthew 5:9*

On April 18, 2012, I emailed Mr. Rich:

Date: Wed, 18 Apr 2012 12:15:21 -0700

From: severerecords7@yahoo.com

Subject: we should do something else

To: johnrichfans@hotmail.com

we should go do something else probably. There might be better battles for us to fight.

Otherwise, I have to reopen the Federal and file a new suit in state Court which would be fun and everything because litigation is what I do. Yet, the evidence suggest that we could allocate resources in other areas to have more substantial impact for the greater good.

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166. My intent was clearly to make peace, not stalk Mr. Rich. Anyone with common sense can see that.

167. John Rich responded:

From: John Rich

<johnrichfans@hotmail.com>

Subject: RE: we should do something else

To: "Chris Sevier" <severerecords7@yahoo.com>

Date: Thursday, April 19, 2012, 9:59 PM

Chris:

To use your own words in your recent email to me, you think it's "FUN" to sue me. I'm pretty sure that kind of sentiment is frowned upon in your profession. I on the other hand find it to be anything but fun. All the charges you have brought against me over the past several years have been tossed out of court for good reason. It's all transparent nonsense. The bad part is that you actually admit to taking pleasure in suing me and causing damage to my life in many ways, personally and professionally. For a guy who I've never even had a conversation with, it's unreal how your venom and threatening rhetoric towards me has spiraled to such depths. It's unsettling. For goodness sake, you've compared me to "Hitler" in official court documents. Need I say more? I'm hoping we get all this put to bed this year sometime after I've been made whole from your unrelenting attacks. I'm willing to be as patient as I need to be.  
JR

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168. Mr. Rich stated that he was "willing to be as patient as I need to be." This referred to the fact that he is calculating. He was planning ways with Mrs. McKenzie to invent ways to discredit me. Mr. Rich and Mrs. McKenzie are convinced that they have the right to hurt me, merely because they are angry. These cases were a major deal to Mr. Rich, and were not so important to me.

169. Mr. Rich has to be calculating because he has never had a real leg to stand on. Mr. Rich and Mrs. McKenzie have to work tirelessly to invent ways to get away with discrediting their opponents or throwing them in jail without incurring liability in the process.

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170. In response to Mr. Rich, I emailed:

From: severerecords7@yahoo.com  
Subject: RE: we should do something else  
To: johnrichfans@hotmail.com

Or alternatively, you could contact Cyndi and say stop the bleeding or lets stop throwing bad money after bad money. The settlement offer is pull your suit, and I'll refrain from reopening the federal lawsuit against you. And I wont refile the case that was before judge campbell in state court to consolidate with your "malicious prosecution" lawsuit. Once I do those things it will be difficult to stop them until completion. You[re] to[o] self entitled to understand that you have been losing from day one. The only thing that you can count on is that you will continue to lose by trusting your "advocates." The only question you have to ask yourself is how much do you want to lose? I'm giving you the chance to walk away. Just remember if you insist we go forward that I gave you that opportunity. What your attorneys hope for is that I provoke your pride so that you'll get angry and want to keep paying them to fuel litigation that has zero chance of hurting me (in fact it helps) but will certainly harm you. The ideal client for any lawyer is one who is arrogant and rich, and thinks that paying to show that they are right is worth the cost. We love those types. The problem is that the issues are way above your head for you to even understand that you have at all times been far from right on any issue. But I often tell my clients who are "right" that fighting to show that you are isn't all what its cracked up to be. The only thing you'll ever prove is that your a moron, and you can take that to the bank and cash it with the checks that you pay to Mrs. McKenzie.

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171. Obviously, I was trying to make peace with Mr. Rich.



172. Mr. Rich demonstrates that he is incapable of letting an insult go. This is true no matter how much it cost him. Mr. Rich postured:

From: John Rich  
To: Chris Sevier  
Date: Fri, 20 Apr 2012 10:59:55 -0700  
Chris:

As you well know, you and I have never even had so much as a conversation together. That being said, I find your emails to me to be incredibly offensive and threatening. As I understand the TN Statute, your comments to me and about me over the course of time amount to cyberstalking.  
Sincerely,  
John Rich

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173. *"Proverbs 29:9 If a wise person goes to court with a fool, the fool rages and scoffs, and there is no peace."* Mr. Rich did not think my attempts to resolve the case were "threatening" or "cyberstalking."

174. Mr. Rich fights dirty. Mr. Rich was reaching for things to falsely accuse me so that he could discredit me in the media.

175. Just like Mr. Rich had falsely stated on Mr. Ashley's answering machine that Mr. Ashley made him feel threatened, Mr. Rich was attempting use that same posturing on me to accomplish the same ends, all of which is all part of the same pattern of dishonesty.

175. Always having to get the last word, having just falsely accused me of cyberstalking, Mr. Rich takes the initiative to email me adding:

From: John Rich  
To: Chris Sevier  
On Fri, Apr 20, 2012 1:40 PM CDT John Rich wrote:

Chris,  
You have been ambulance chasing me for years now to the tune of.....

---

176. *"Mockers are proud and haughty; they act with boundless arrogance." Proverbs: 21:24.*

Mr. Rich is unquestionably attempting to provoke conversation.

177. Mr. Rich cannot have it both ways. In on email, he emailed me of "cyber stalking," despite knowing that I had legitimate grounds for contacting him. In the next email, he was taking the initiative to email me, engaging in name calling and raising an issue that relates to settlement.

178. Mr. Rich also cannot have it both ways insofar as I am proposing that we "go do something else" and yet he wants to keep me around by keeping the litigation going, which means that he is position of "cyberstalking" is insincere. From the beginning of this controversy, Mr. Rich was the one who was stalking me.

179. Mr. Rich knew that I had valid reasons for contacting him. Mr. Rich and I are basically like two creditors and debtors and were talking to one another about ways to resolve the conflict between us that was costing him hundreds of thousands of dollars.

180. Additionally, in his email, Mr. Rich offers an idea that conflicts with the prior one because he was hoping to draw me in to falsely accuse me of a crime because he thinks that no one can see through his malicious schemes. Mr. Rich was setting one of his traps.

181. Mr. Rich indicates that the litigation was costing him a fortune, although he did not list the actual number to create some suspense.

182. My grounds for contacting Mr. Rich amounted to an effort to help him out of the litigation that was costing him to the tune of a large amount.

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In response to Mr. Rich I stated;

Date: Fri, 20 Apr 2012 12:35:01 -0700

From: severerecords7@yahoo.com  
Subject: RE: we should do something else  
To: johnrichfans@hotmail.com

Im giving you the opportunity to end litigation. But your of course too stupid to realize it. You are your attorneys wet dream. Every dollar every minute you spend on these matters is evidence of how much of a retar[d] you actually are. You have been fighting yourself. You wish [t]hat you were important enough for anybody [t]o cyber stalk. Instea[d]s you[r] just a dumb redneck from texa[s] with sham talent who is heading towards the f list. I can afford to talk to you like this. But this is what your attorneys want. They want me to make you mad so that you'll keel paying them to prove your importance to yourself. The offer is we pull our suits and go to the house or you can keep paying your attorneys to damage you.

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183. *"Better to be poor and honest than to be dishonest and rich."* Proverbs 28:6. Let's just be honest. I went to Vanderbilt undergrad and majored in politics. I am a litigator, who was conditioned by the United States military to be aggressive in the pursuit of justice. Mr. Rich on the other hand, barely had a high school diploma. He literally grew up in a trailer park; his capacity for logical reasoning is obviously low. I did not necessarily take pleasure in taking down to Mr. Rich, but even Marc Oswald effectively stated on tape, that Mr. Rich is so hot headed that the only way to get through to him is to talk down to him.

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In response Mr. Rich stated:

-- On Fri, 4/20/12, John Rich <johnrichfans@hotmail.com> wrote:

From: John Rich <johnrichfans@hotmail.com>  
Subject: RE: we should do something else  
To: "Chris Sevier" <severerecords7@yahoo.com>



Date: Friday, April 20, 2012, 3:26 PM

Chris:

After these past few emails from you I feel completely harassed, threatened and stalked by you.  
Please stop. JR

---

184. Mr. Rich did not feel threatened and stalked. He was merely posturing to frame me for stalking so he could discredit me in the media. *"The rich are wise in their own eyes; one who is Mr. and discerning sees how deluded they are." Proverbs 28:11.*

185. I was not communicating with Mr. Rich because I felt that it was good for my health. I was contacting him because the law encourages settlement negotiation and out of court resolution.

Also, I was operating under tight deadlines and was hoping to get Mr. Rich away from me.

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I responded:

-----Original Message-----

From: chris severe <severerecords7@yahoo.com>

Date: Fri, 20 Apr 2012 22:32:09

To: <johnrichfans@hotmail.com>

Subject: RE: we should do something else

by the way, I really appreciate the credentials you've paid for me to acquire so far things such as this: <http://www.nashvillescene.com/nashville/the-sopa-bill-may-be-dry-docked-but-the-battle-over-online-piracy-rages/Content?oid=2797644>. Or The reversal before the 6th Circuit. I hope that you continue to provide a platform for me to run for office someday because unlike yourself, I studied politics at Vanderbilt.

---

I appreciate your continued investment into helping me demonstrate that no one is above the law.

We'll do a lot of good together taking down Nancy Jones and others. This will be good for the

community overall, so keep drinking crown and telling yourself how important and powerful you are. You'll need the delusions in full force to enable your childish crying that has gotten you nowhere.

---

COMMENTARY: *Matthew 7:2 For in the same way you judge others, you will be judged, and with the measure you use, it will be measured to you.*

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186. Due Mr. Rich's inability to let things go he has to get the last word in and emails me:

From: John Rich <johnrichfans@hotmail.com>  
Subject: Re: we should do something else  
To: "chris severe " <severerecords7@yahoo.com>  
Cc: "John Rich " <johnrichfans@hotmail.com>  
Date: Friday, April 20, 2012, 5:54 PM

Chris, you are STILL sending these harassing emails? I have now told you 3 times to STOP. This is too much.

---

187. COMMENTARY: *"A faithful witness does not lie, but a false witness breathes out lies."*  
*Proverbs 14:5.*

1. A creditor has the right to make reasonable attempts to resolve the debt owed with a debtor.

Given the fact that Mr. Rich and I had been involved in litigation for years that was costing him to the tune of a fortune, anyone with common sense can see that Mr. Rich's position was not credible, but in step with the logic reasoning skills of a person with a high school diploma.

---

2. Mr. Rich was engaging in insincere semantics, whereas I was trying to discuss ways to resolve three lawsuits that were costing Mr. Rich a fortune and wasting my time.

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188. Since Mr. Rich had proved that he was willing to talk by continuing to respond, I emailed him:

Date: Fri, 20 Apr 2012 16:06:12 -0700  
From: severerecords7@yahoo.com  
Subject: Re: we should do something else  
To: johnrichfans@hotmail.com

I am the only one who is helping you attempt to think logically. I know you didn't major in math in high school but think of the numbers. Every time you pay Cyndi to go to court we should get together and laugh about how much you have spent in your attempts to prove yourself right verses the value you have gotten out of your investment. Take for example even the 24k judgment you received, hows collecting that panning out for you? Do you really think that there has ever been any upside for you in litigation. It doesn't matter how bias the lower court judges are in favor of your advocates. I am protecting yourself and your family by advising you to withdraw your baseless lawsuit in exchange for not reopening the Federal lawsuit which will harm you financially as your brought to accountability and refiling a state lawsuit against you and several others that is well plead, and is going to be time costly and expense. I have been the only advocate you have had in these matters for some time now. Anyone encouraging you that pursuing your lawsuit is worth while is giving you self servicing advice. You don't understand the issues or the math involved, like us.

189. *"Blessed are the peacemakers, for they shall be called sons of God." Matthew 5:9*

190. *Proverbs 26:12 "There is more hope for fools than for people who think they are wise."*



In response to the email, Mr. Rich stated:

From: John Rich <johnrichfans@hotmail.com>  
Subject: RE: we should do something else  
To: "Chris Sevier" <severerecords7@yahoo.com>  
Date: Friday, April 20, 2012, 6:12 PM

CHRIS!

This is the FOURTH time in the past few hours that I have ordered you to STOP with these harassing emails! I've seen pictures of you online in military gear holding a weapon with camouflage paint on your face, I have to assume that is the frame of mind you are in. You are scaring the hell out of me and my family and I will NOT stand for it any longer. I will not tell you again to STOP stalking me through my email. CEASE.

JR

---

191. *"Among my people are the wicked who lie in wait like men who snare birds and like those who set traps to catch people." Jeremiah 5:26*

192. This email is one of the most important as it relates to Mr. Rich's false affidavit he supplied to the police in support of the phony stalking charge. The pictures that Mr. Rich was referring to relate to one of my bands, American Propaganda. Although I have never visited Mr. Rich's websites, Mr. Rich admitted to trolling mine, which raises the question of who was cyberstalking who?

193. What was critically important about this email is that Mr. Rich brought my artist photos into settlement conversation. That is, Mr. Rich opened the door to using my artist pictures as a relevant part of our discussions to resolve conflict. As an artist himself, Mr. Rich knows that art

is not reality. He was not any more afraid of my artist photos than I was of his. Mr. Rich had taken the initiative to track down my artist photos as part of his plan to "monitor my activity closely."

194. If Mr. Rich had not open the door to the artist pictures in this email, then the American flag photo would have never been brought up. Mr. Rich was setting one of his infamous backfiring traps.

195. What T.V. Guide, CBS Corp, and Lions Gate need to understand is that Mr. Rich could care less about the truth. He will say whatever in his quest to obtain power. This character defect will come back onto T.V. Guide in an adverse way.

196. Additionally, the fact that Mr. Rich was emailing me, shows that he was not afraid, but rather furthering his childish plot with Mrs.McKenzie to falsely accuse me of stalking so they could play out their naa naa na na scenario in the media.

197. Moreover, Mr. Rich decided, on his own to throw his family in the mix of settlement discussions, in this email. Mr. Rich opened the door to include his family in this discussion settlement making them relevant.

198. Mr. Rich is the kind of person that will use his family as a pawn in litigation, not because he is concerned for anyone's welfare other than his own.

199. The evidentiary record demonstrates that Mr. Rich cares more about being proved right than he does his own family. He uses his family as if they were pawn in as part of his litigation chest match because that is the kind of person he is. T.V. Guide, Lions Gate, and CBS Corp. should be advise of this before going through with the contact.



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200. In response to Mr. Rich's disturbing use of his family and obvious manipulation tactics, I responded:

Date: Fri, 20 Apr 2012 16:17:06 -0700  
From: severerecords7@yahoo.com  
Subject: RE: we should do something else  
To: johnrichfans@hotmail.com